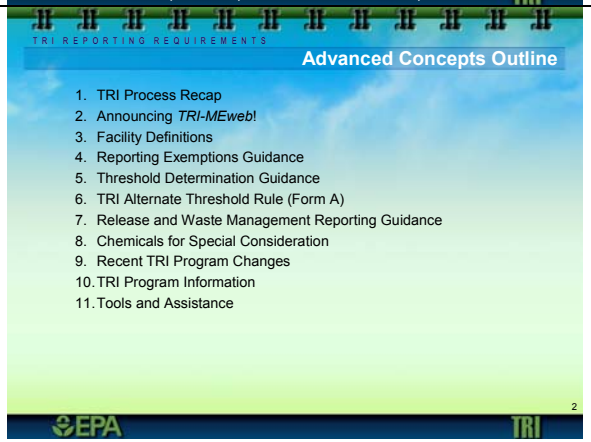
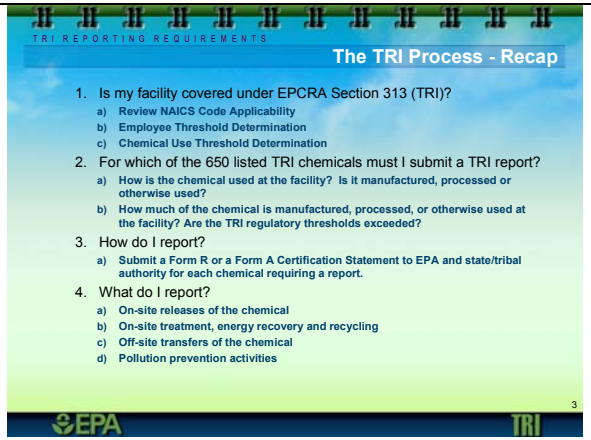

Reporting Year 2007
EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA) Section 313
EPA
Toxics Release Inventory
Reporting Requirements
Advanced Concepts
(Includes Recap of Basics)
Note: This program includes audio narration.
Use speakers or headphones for audio. Click Notes button for captions.
TRI

Slide 1 **Welcome Screen** Duration: 00:00:49		**Notes:** Welcome to the Emergency Planning and Community Right-to-Know Act, Section 313, Toxics Release Inventory online training for the 2007 reporting year. This is the Advanced Concepts Module of a two part training course that is made up of this module and an Basic Concepts module. The Advanced Concepts module assumes a basic understanding of the Toxics Release Inventory, or TRI, requirements and focuses on key concepts that will help to ensure accurate TRI reporting. The Basic Concepts module walks you through the process of determining whether or not your facility is required to report to TRI, and if so, how you actually prepare and submit information to TRI.
Slide 2 **Advanced Concepts Outline** Duration: 00:00:57		**Notes:** In this module we'll first introduce a new TRI reporting tool – TRI-ME web – that is the next generation of TRI Made Easy reporting software. We'll also provide a brief review of the overall TRI process and then focuses on key concepts that will help to ensure accurate TRI reporting, including facility definitions, and guidance on reporting exemptions, threshold determinations, the Form A, and release and waste management reporting. We will also discuss a number of TRI chemicals and chemical categories with special considerations. Finally, we will go over recent changes to the TRI program, how to submit forms, revisions, and withdrawals electronically, and the tools and assistance that are available to help facilities with their TRI requirements.

Slide 3

The TRI Process - Recap

Duration: 00:02:33



Notes:

Let's briefly review the process for determining whether or not a facility needs to report to TRI and how it reports to TRI.

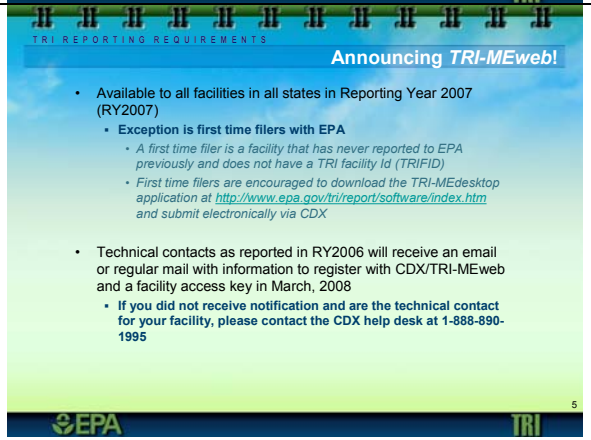
A stepwise process can be used to determine if and what you would need to report to TRI. The first step is determining whether or not your facility is covered under EPCRA Section 313 and would, therefore, need to consider its toxic chemicals for TRI reporting. Whether or not your facility is covered is based on the types of activities carried out at the facility and the number of employees working for your facility. NAICS is the North American Industrial Classification System, which assigns numeric codes to characterize the activity taking place at the facility. We will talk more about the NAICS codes requirement shortly.

The next step is to determine for which TRI chemicals you must submit a TRI report. Covered facilities need to look at the TRI chemicals that are on the list and that may be present at the facility. Next, facilities need to look at how the chemicals are used. Are they manufactured? Processed? Or otherwise used? These are the TRI threshold activities. We will be describing each of these in more detail.

Next, facilities must calculate the quantity of the TRI chemical that is manufactured, processed, or otherwise used, and compare those quantities to the TRI activity thresholds. Only when activity thresholds are exceeded would the facility be required to complete and submit a TRI report, either a Form R or a Form A.

What information do facilities report to TRI? For the Form R, which is the more common means of TRI reporting, facilities report on how the TRI chemical is managed as waste, including onsite releases, treatment, energy recovery, recycling of the TRI chemical and offsite transfers, and pollution prevention activities that are conducted at the facility for that chemical.

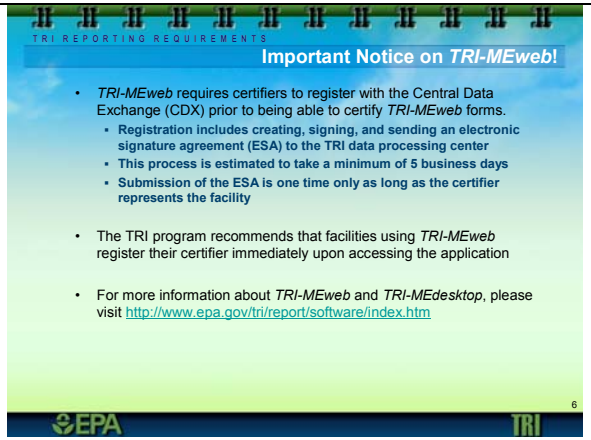
Because TRI reporting is done on an annual basis, facilities should reexamine their thresholds and reporting every year to make sure they are reporting accurately for all of the chemicals for which they have exceeded thresholds.

Slide 4 **Section I: Announcing TRI-ME Web!** Duration: 00:00:05		**Notes:**
Slide 5 **Announcing TRI-MEweb!** Duration: 00:00:59		**Notes:** TRI-ME web is the next generation of software for completing and submitting TRI forms. TRI-ME web is now available to all facilities for reporting year 2007 provided your facility has filed to TRI in the past and has a TRI facility ID. If your facility is reporting to TRI for the first time, you are encouraged to download and use the TRI-ME desktop application available from the website shown here. Facilities need a facility access key to register for TRI-ME web and submit their reports via the Central Data Exchange, or CDX. Access keys were sent to TRI technical contacts via email and regular mail in March of this year. If you did not receive an access key for your facility, contact the CDX help desk at the toll free number shown here.

Slide 6

Important Notice on TRI-MEweb!

Duration: 00:00:55



Notes:

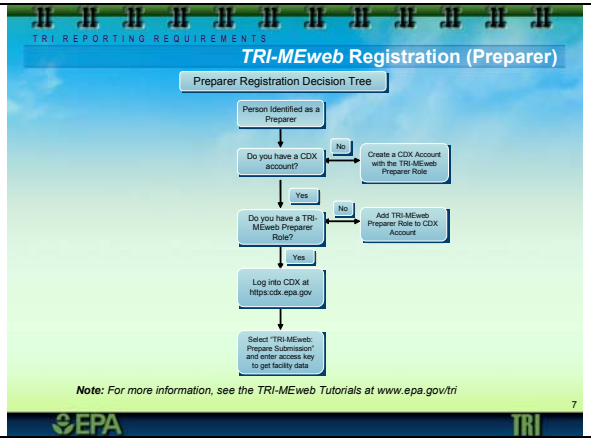
Certifiers of TRI forms submitted via TRI-ME web must first register with EPA's Central Data Exchange. Registration includes creating, signing, and mailing and electronic signature agreement, or ESA, to the TRI data processing center. Facilities should identify their certifiers and complete the registration process as soon as possible because this process will take at least 5 business days. Note that the submittal of an ESA is a new requirement beginning this year, but it only needs to be done once, as long as the certifier represents the facility.

For more information about the TRI-ME web or the TRI-ME desktop application, including web-based tutorials, visit the TRI website shown here.

Slide 7

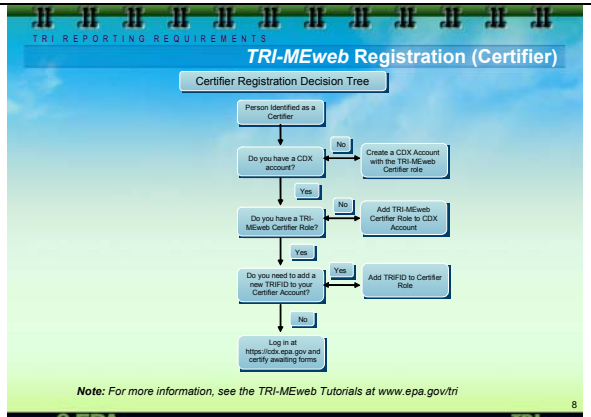
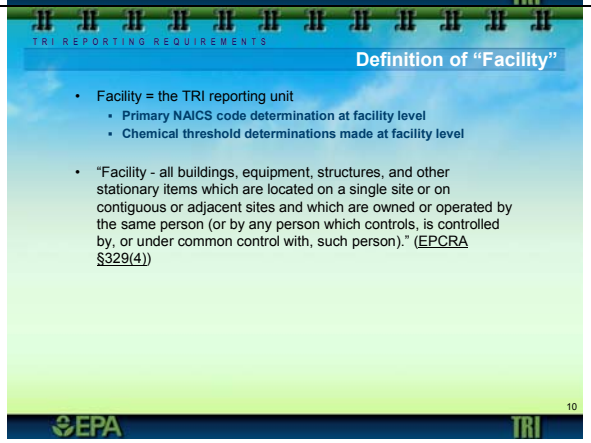
TRI-MEweb Registration (Preparer)

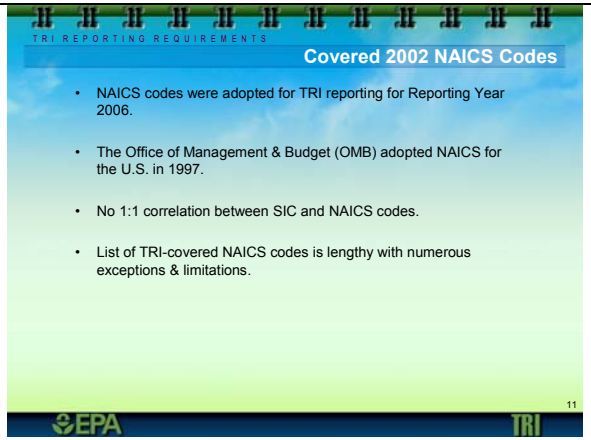
Duration: 00:00:26



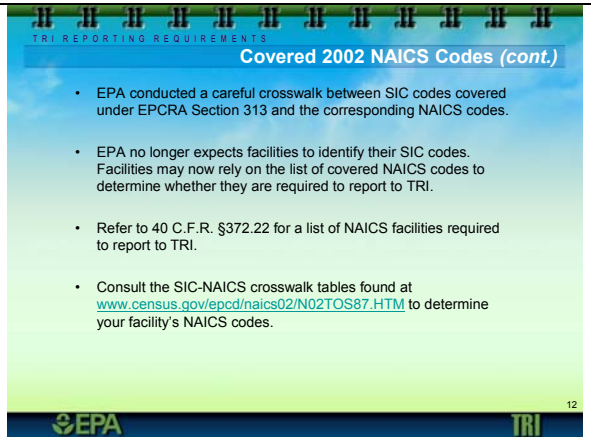
Notes:

Those wishing to use TRI-ME web to prepare and submit their TRI submissions must have BOTH an account with EPA's Central Data Exchange AND have added the TRI-ME web preparer role to their CDX account. This decision tree can help you determine which of these requirements apply to you and ensure that you will be able to access your facility data in TRI-ME web.

Slide 8 **TRI-MEweb Registration (Certifier)** Duration: 00:00:40		**Notes:** Those certifying TRI forms submitted via TRI-ME web must also have BOTH a CDX account and have added the TRI-ME web certifier role to their CDX account. Again, this decision tree can help you identify and complete the necessary steps needed to log into the CDX and certify awaiting forms. Note that there is more assistance available for preparers and certifiers using TRI-ME web at the EPA TRI program homepage at www.epa.gov/tri.
Slide 9 **Section II: Definition of "Facility"** Duration: 00:00:05		**Notes:**
Slide 10 **Definition of "Facility"** Duration: 00:01:23		**Notes:** As previously mentioned, the reporting unit under TRI is the facility. Primary NAICS codes determinations and employee threshold determinations are made at the facility level. Chemical threshold determinations are also made at the facility level. Therefore, the definition of a facility under TRI is very important. EPA defines a facility as "all buildings, equipment, structures, and other stationary items which are located on a single site or contiguous or adjacent sites and which are owned or operated by the same person (or by any person which controls, is controlled by, or under common control with such person)."

Slide 10 - Continued **Definition of "Facility"** Duration: 00:01:23		**Notes:** A key point here is that establishments or operations owned or operated by the same company or federal agency that are contiguous or adjacent are considered a single facility under TRI. In some instances, a single site or adjacent properties may be have multiple and distinct establishments, each considered to be a unique and separate economic unit. Together, these establishments comprise a single facility under TRI if they are owned or operated by the company or agency.
Slide 11 **Covered 2002 NAICS Codes** Duration: 00:01:23		**Notes:** Only certain industries are covered by TRI, including: all manufacturing; portions of metal mining; portions of coal mining; certain electric utilities; treatment, storage, and disposal facilities; solvent recovery facilities; chemical distributors; and petroleum bulk terminals. Facilities should be aware that prior to reporting year 2006, the industries covered by TRI were defined by their primary Standard Industrial Classification codes. The US Office of Management and Budget adopted NAICS codes to replace the SIC Code System in 1997 and, in reporting year 2006, the TRI program began using the NAICS codes developed in 2002 to define which facilities are covered under TRI. In addition, the TRI forms now require that facilities report the NAICS codes that represent their facility's industry sector. There is no one-to-one correlation between the old SIC code system and NAICS codes. The list of TRI-covered NAICS codes is rather lengthy. And it does include a number of exceptions and limitations.

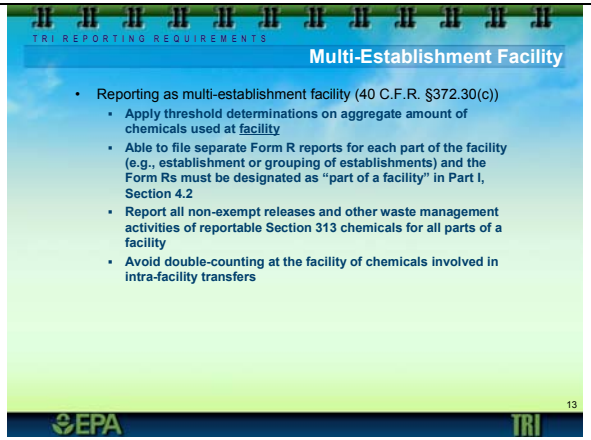
Slide 12
Covered 2002 NAICS Codes (cont.)
Duration: 00:00:53



Notes:

EPA conducted a careful crosswalk of the covered SIC codes to the 2002 NAICS codes. Therefore, facilities that were covered by TRI under previous years based on their SIC code classifications will also be covered under the NAICS code classifications. SIC codes are no longer necessary to determine whether your facility is covered by TRI. Instead, facilities can rely on the list of NAICS codes that is published in Chapter 40 Section 372.22 of the Code of Federal Regulations.
To identify your facility's NAICS codes using its SIC codes, facilities can access a crosswalk between the old SIC code system and the new NAICS codes at the website shown here.

Slide 13
Multi-Establishment Facility
Duration: 00:01:34

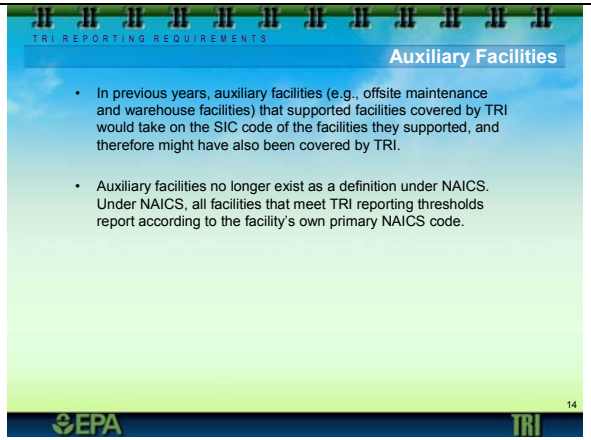


Notes:

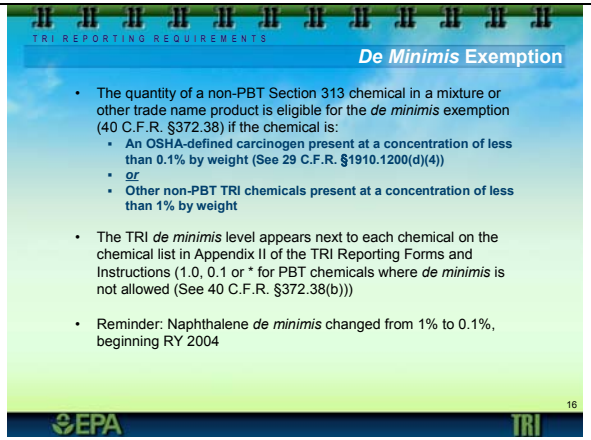
Multi-establishment facilities were discussed in detail in the Basic Concepts module of this online training course. In some instances, a single site or adjacent properties may be have multiple and distinct establishments, each considered to be a unique and separate economic unit. Together, these establishments comprise a single facility under TRI if they are owned or operated by the company or agency.

For threshold determinations facilities must consider the aggregate amount of TRI chemicals used throughout the facility, including all of the establishments. If a threshold is exceeded a TRI form is required. Multiple establishment facilities can file separate Form R reports for each part of the facility.

On the TRI Form R and in the reporting software, the filer can designate their submittal for a part of the facility. Remember to report all non-exempt releases and other waste management activities of reportable TRI chemicals for all parts of a facility. When reporting as multiple establishments, avoid double-counting of the same chemicals. When facilities do report as separate establishments within the same facility, the quantities on the reports will be added together by EPA, and the reports that are made available to the public will show the aggregate amounts.

Slide 14 **Auxiliary Facilities** Duration: 00:01:22		**Notes:** Prior to the 2006 reporting year, auxiliary facilities were required to report to TRI. As part of the transition to NAICS codes, the auxiliary facility designation no longer applies under TRI. Auxiliary facilities are separate facilities, whose primary function is to support a facility that is covered by TRI. These facilities – such as warehouses or maintenance facilities – would take on the SIC code of the facility that they supported. Therefore, these auxiliary facilities had met the first requirement under TRI based on the facility's SIC code. Auxiliary facilities would then need to determine whether or not they had 10 or more full time employees and whether or not they exceeded any chemical threshold, and if so, they would be required to report to TRI as a separate facility. Under the new NAICS code system, auxiliary facilities no longer take on the SIC code of the facility that they support. Instead, they would keep the non-TRI covered NAICS code designation that best describes the activities that are actually taking place at the facility.
Slide 15 **Section III: Exemptions Guidance** Duration: 00:00:05		**Notes:**

Slide 16
Exemptions Guidance
Duration: 00:01:20



Notes:

Now let's look at key points that facilities should understand about the exemptions to TRI threshold determinations and reporting that were discussed in the Basic Concepts module of this online training.

First, let's look at the de minimis exemption. Under the de minimis exemption, the quantity of a non-PBT TRI chemical in a mixture or other trade name product would not need to be considered for threshold determination and reporting if – in the case of an OSHA-defined carcinogen, the TRI chemical is present at a concentration less than 0.1% by weight. Or in the case of non-OSHA-defined carcinogen at a concentration of less than 1% by weight. The de minimis concentrations are provided for each chemical on the TRI chemical list, which is Table II of the reporting forms and instructions. It is also available from the TRI assistance library and the TRI-ME reporting software. Recently, in the 2004 reporting year, the de minimis concentration for napthalene changed from 1% to 0.1% as that chemical became an OSHA-defined carcinogen.

Slide 17
De Minimis Exemption
Duration: 00:00:57

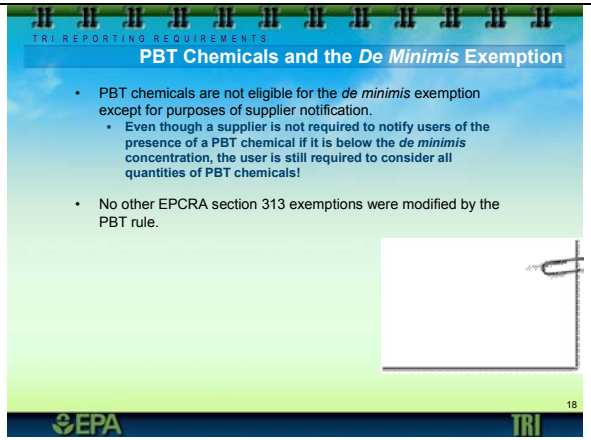
Notes:

So how does the de minimis exemption work? The de minimis exemption can apply to non-PBT chemicals that are in mixtures of trade name products that are processed or otherwise used. It can also apply to two manufacturing activities: coincidentally manufacturing when the TRI chemical remains as an impurity in the product; and importing the mixture containing the TRI chemical. In other words, the de minimis exemption does not apply to manufacturing of chemicals in most cases, including coincidentally manufacturing of TRI chemicals when they do not remain in the product. The de minimis exemption does not apply to wastes, including those that are received from off-site for the purpose of waste management. Also, the de minimis exemption does not apply to PBT chemicals.

Slide 18

PBT Chemicals and the De Minimis Exemption

Duration: 00:00:55



Notes:

While chemical users cannot apply the de minimis exemption for PBT chemicals, suppliers of PBT chemicals are not required to notify users of the presence of TRI chemicals, including PBT chemicals, that are below the de minimis concentration.

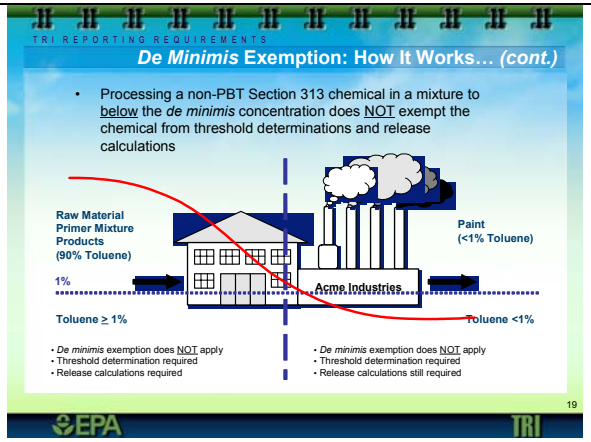
If a facility has information on the presence of PBT chemicals in mixtures that they receive from a supplier, they should use that information for determining whether or not a threshold was exceeded and any subsequent reporting. If a facility has no information as to the presence of a PBT chemical in a mixture received from a supplier, they would not need to consider it.

Again, the de minimis exemption cannot be used for PBT chemicals. However, all other exemptions apply to both PBT and non-PBT chemicals.

Slide 19

De Minimis Exemption: How It Works… (cont.)

Duration: 00:01:08



Notes:

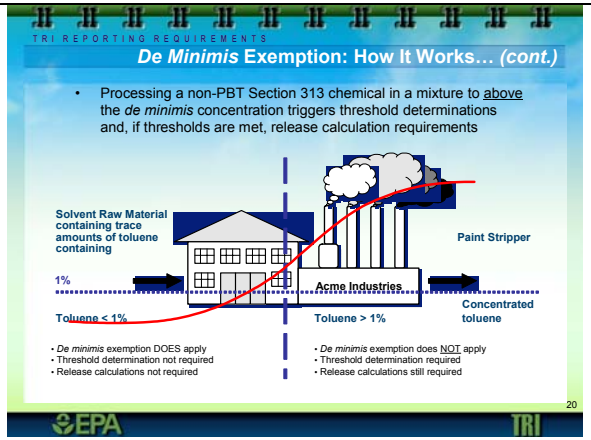
Let's look at a couple of examples for which the de minimis exemption can and cannot be used. First, let's say we have a raw material coming into a facility and the raw material is 90% toluene. So in this case it comes into the facility above the de minimis concentration for toluene of 1%. However, during the process, the concentration of the toluene in the production process decreases to a level less than 1% or below the de minimis concentration. Would we be able to apply the de minimis exemption?

De minimis would not apply in this situation, even after the point where the concentration of the toluene goes below the 1% de minimis. Once the TRI chemical is above the de minimis concentration, the de minimis exemption cannot be taken for that chemical mixture. So, in this case the facility would need to consider the toluene towards its activity thresholds, and towards any release or waste management reporting required.

Slide 20

De Minimis Exemption: How It Works… (cont.)

Duration: 00:01:03



Notes:

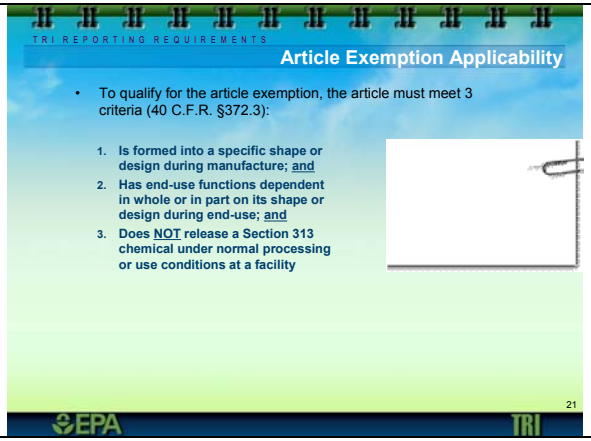
Let's look at the opposite situation where we again have toluene but this time it is coming into the facility in a raw material at a concentration below the de minimis and it's getting concentrated through the process to a level that is above the de minimis concentration. In this case the de minimis exemption can be applied to the mixture at any point before it goes above de minimis concentration. However, as soon as it goes above that concentration, it must be considered towards your threshold determination in any release or waste management reporting. So again, all the toluene before it goes above de minimis concentration would be considered exempt from threshold determination and reporting.

However, after it goes above the de minimis concentration, the TRI requirements get turned on and the facility would need to consider the toluene toward the threshold determination in any subsequent reporting.

Slide 21

Article Exemption Applicability

Duration: 00:00:38



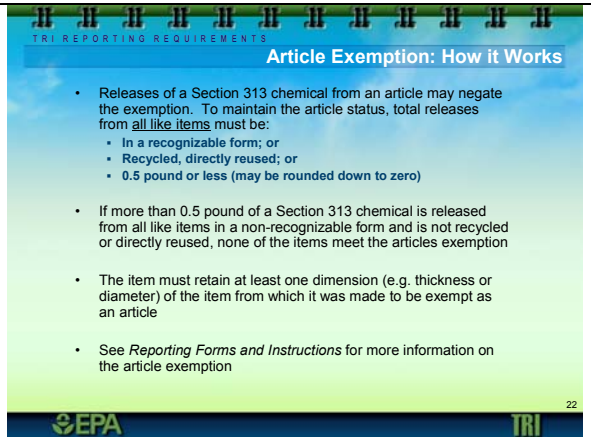
Notes:

Next, let's look at the articles exemption. TRI chemicals contained in articles are exempt from TRI. There are three criteria that must be met to be considered an article under TRI. First, an article is formed into a specific shape or design during its manufacture. Second, an article has an end-use function that is dependent in whole or in part on that shape or design. And, third, an article does not release a TRI chemical under normal processing or use conditions at the facility.

Slide 22

Article Exemption: How it Works

Duration: 00:01:17



Notes:

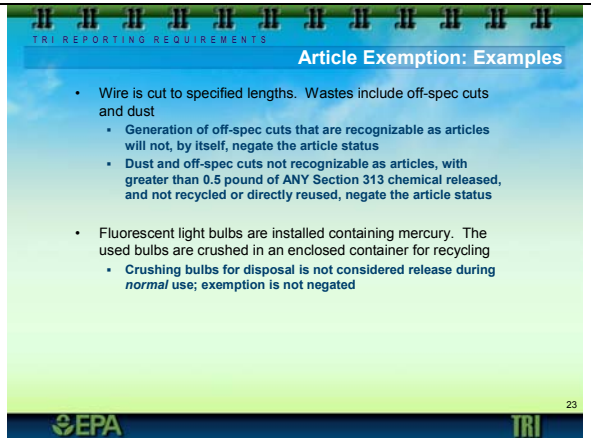
Lets look closer at the requirement of not releasing a TRI chemical under normal processing and use conditions. If a TRI chemical is released from an article during its normal use, it very well may negate the article's exemption. In order to maintain the article's status, the total TRI chemicals released from all like articles or like items must be either: 1) in a recognizable form, or 2) recycled directly or directly reused, or 3) must be less than half a pound. In a recognizable form means that the releases from the article must still look like and be recognized as pieces of the article.

In other words, if more than half a pound of TRI chemical is released from all the like items used at the facility in the course of the year, and the releases are not in a recognizable form, and they are not recycled or directly reused, none of the items meet the article exemption. Also, to maintain a recognizable form, the article must maintain its thickness or diameter to be considered exempt as an article.

Slide 23

Article Exemption: Examples

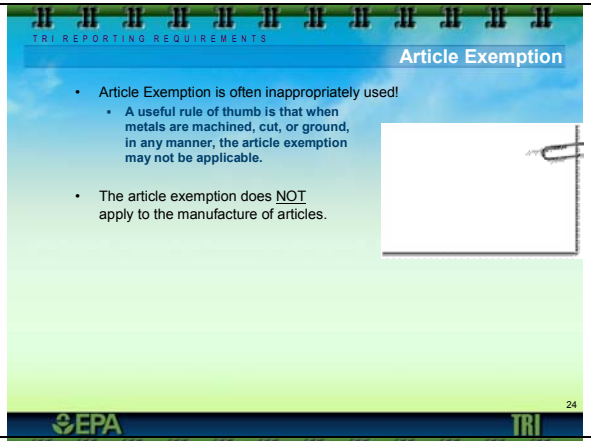
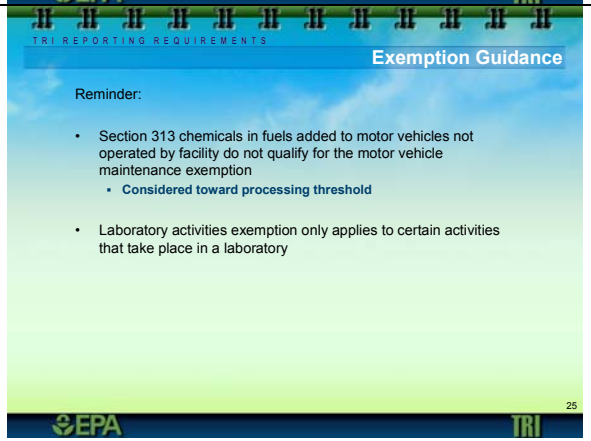
Duration: 00:01:27

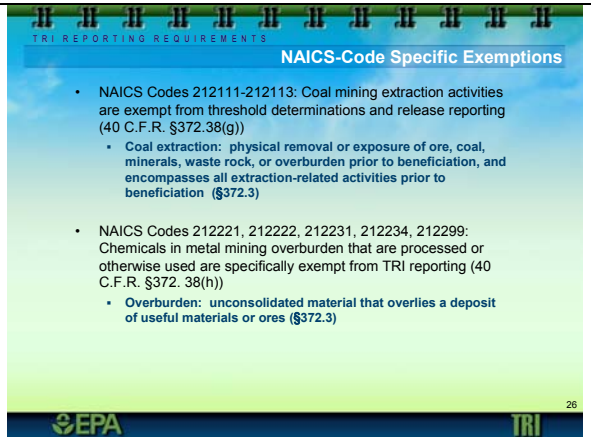


Notes:

Here is an example of an operation in which wire is cut into specified lengths. Wire itself would be considered an article, but in cutting the wire to the specified lengths, there is some waste of off-spec cuts and some dust. The generation of the off-spec cuts that are still recognizable as pieces of wire will not by themselves negate the article's status. Quantities of the dust and off-spec cuts that are not recognizable as pieces of wire and that are greater than half a pound for any TRI chemical and not recycled or directly reused would negate the article status.

Let's look at an example where a facility uses fluorescent light bulbs which contain mercury, a TRI chemical. When the bulbs are no longer of use, they are crushed prior to recycling. In this case the fluorescent bulbs would still be exempt as articles. The normal use of the fluorescent bulbs does not release mercury. Crushing of the bulbs may release mercury, but that is not considered normal use of the bulb, so the exemption is not negated. Note that the mercury in the bulbs is exempt from TRI reporting, but other regulatory requirements associated with the proper management of waste fluorescent bulbs should be followed.

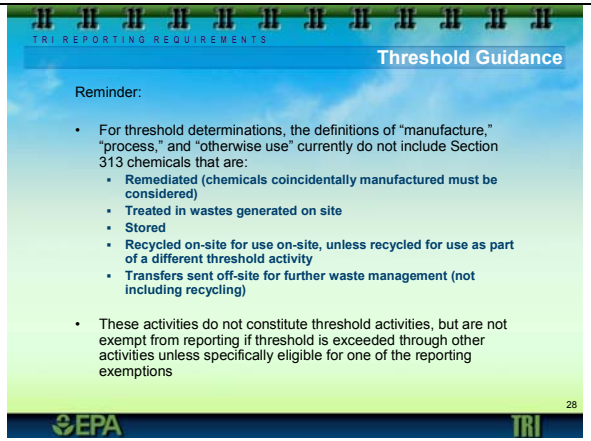
Slide 24 **Article Exemption** Duration: 00:00:38		**Notes:** Facilities need to be careful that they do not inappropriately use the articles exemption. Because it only takes ½ pound of TRI chemical released or disposed of over the course of a year to negate the articles status, often when metals containing TRI chemicals are machined, cut, or ground, in any manner, the article exemption would not apply. Also the article exemption does not apply to the actual manufacturing of articles. The articles need to be brought in from a supplier and processed or otherwise used at the facility.
Slide 25 **Exemption Guidance** Duration: 00:01:26		**Notes:** The Basics Concepts module of the online training goes into more detail on each of the TRI exemptions, but here we have a few reminders. First, the TRI chemicals in fuels added to motor vehicles not operated by the facility do not qualify for the motor vehicle maintenance exemption. They would be considered towards the processing threshold and this exemption only applies to the otherwise use of TRI chemicals. For example, some facilities that manufacture vehicles add a few gallons of fuel before the vehicles leave the facility for distribution into commerce. Because those vehicles are not operated by the facility, the chemicals in the fuel are considered processed. Similarly, the laboratory activities exemption only applies to the otherwise use of TRI chemicals in certain activities that take place in a laboratory. Facilities should take care not to apply this exemption more broadly than it should be. If an activity involving a TRI chemical takes place in a laboratory, it does NOT mean that it is necessarily exempt. Only certain activities are exempt. More information on all of the TRI reporting exemptions can be found in the “Reporting Forms and Instructions” document.

Slide 26 **NAICS-Code Specific Exemptions** Duration: 00:00:41		**Notes:** There are also a number of industry-specific, or NAICS-code specific exemptions. The first one applies to certain coal mining activities that would be exempt from threshold determinations and release reporting. For coal mining, the exempt activities include the physical removal or exposure of the ore or coal prior to the beneficiation of the material. Similarly, certain metal mining activities are also exempt from TRI reporting. In this case, TRI chemicals in the overburden, or the unconsolidated material that overlies the deposits, are exempt from reporting.
Slide 27 **Section IV: Threshold Guidance** Duration: 00:00:05		**Notes:**

Slide 28

Threshold Guidance

Duration: 00:02:23



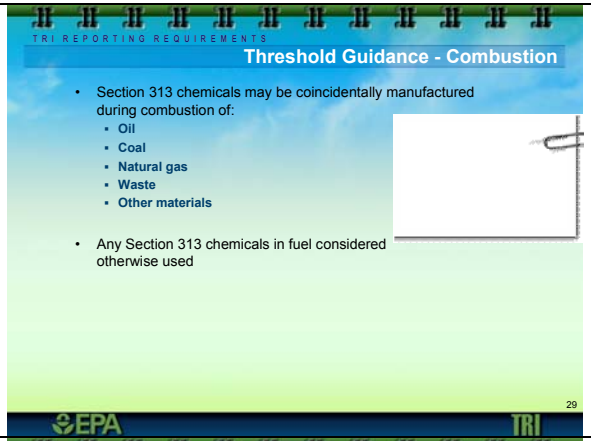
Notes:

Now we will go over some reminders regarding threshold calculations. Facilities should be aware that there are some activities that are not considered to be threshold activities under TRI. In other words, the activities are not considered manufacturing, processing, or otherwise use. None of the TRI chemicals associated with these activities would need to be considered towards an activity threshold. These activities are shown here and include: remediating chemicals; treating chemicals in waste generated on-site; storing chemicals; recycling on-site for use on-site; and transfers sent off-site for further waste management, not including recycling.

For example, let's say a facility stores 50,000 pounds of a chemical onsite. The act of just storing that chemical is not a threshold activity. It's not manufacturing. It's not processing. It's not otherwise use. However the fact that they are storing the chemical on-site probably means that they are also using it in their process. At some point they will pull quantities out of storage and process or otherwise use it in their production process. At that point they are processing the quantity of the chemical removed from storage, and that quantity gets counted towards their processing threshold. However, if the facility were to stop making a certain product line and continued to store the chemical for the reporting year and never used it, they would not need to consider it towards any threshold.

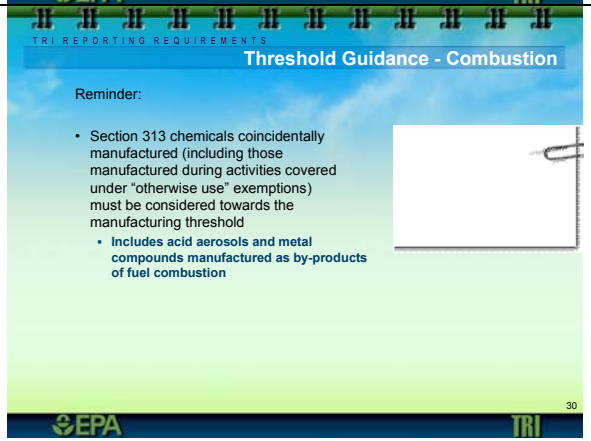
Facilities should be aware that while these activities are not threshold activities, that is not the same as being exempt from TRI. The activities listed here are not exempt from reporting; but they are not counted toward the threshold determination. However, if a TRI chemical threshold was exceeded in some other manner at a facility, a TRI form would be required for that chemical. Any release and waste management reporting for that chemical would need to include any releases or other waste management associated with these activities.

Slide 29
Threshold Guidance - Combustion
Duration: 00:00:40



Notes:
Here is some guidance on combustion. Many facilities have on-site combustion processes where TRI chemicals may be present in in fuels used, and may be coincidentally manufactured during the combustion of oil, coal, natural gas, waste or other materials. Any TRI chemical in the fuel is considered otherwise used and the quantity would be applied towards the otherwise use threshold. Any TRI chemical generated when he fuel is combusted is considered coincidentally manufactured and the quantity would be applied to the manufacturing threshold.

Slide 30
Threshold Guidance - Combustion
Duration: 00:01:13

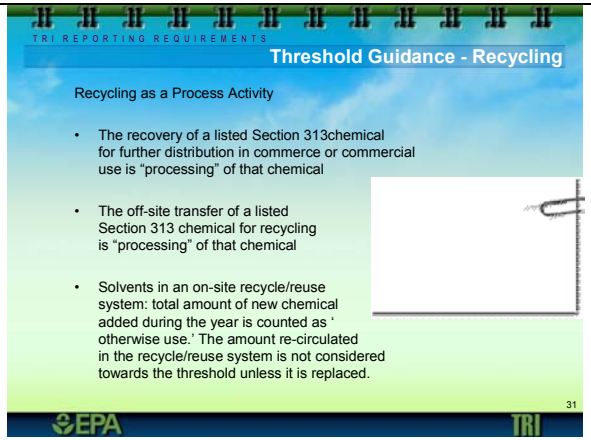


Notes:
Again, those TRI chemicals coincidentally manufactured during combustion must be considered towards the manufacturing threshold. Any TRI chemicals contained in fuels combusted are otherwise used and count toward the otherwise use threshold.

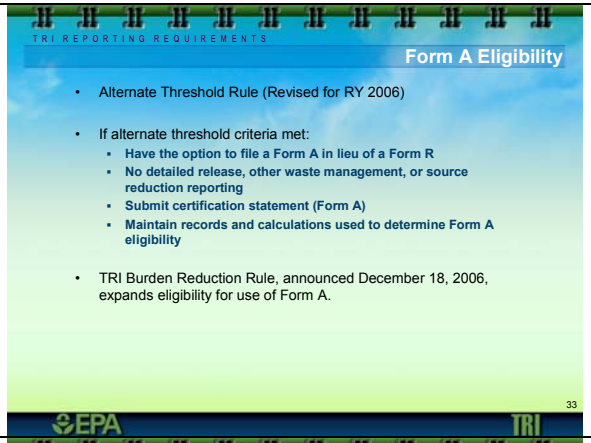
The non-PBT TRI chemicals in the fuel otherwise used is eligible for the de minimis exemption, and many of the TRI chemicals found in fuels DO exist below de minimis concentrations. However, TRI chemicals that are coincidentally manufactured during combustion will not fall under the de minimis exemption.

Common TRI chemicals coincidentally manufactured during combustion include acid aerosols, such as sulfuric acid aerosols. Metal compounds are also coincidentally manufactured as byproducts of fuel combustion.

So, when combusting fuels and other materials, be sure to consider both aspects of the combustion process: How much of each TRI chemical is otherwise used, and how much is manufactured?

Slide 31 **Threshold Guidance - Recycling** Duration: 00:01:44		**Notes:** Off-site recycling is considered a process activity, because a TRI chemical is being recovered for further distribution in commerce or for commercial use. The quantities of TRI chemical recycled off-site, therefore, count toward the processing threshold. If the threshold is exceeded, the quantity of the TRI chemical sent offsite for recycling is entered into Section 6.2 as an offsite transfer. Many facilities use solvents containing TRI chemicals in systems that continually recycle or reuse the solvent onsite. The onsite recycling is not counted towards the processing threshold. However, the solvents are being otherwise used over and over. In this case, only the amount of new chemical added to the system during the reporting year would be counted towards the otherwise use threshold. Facilities should be aware of the difference between recycling and reuse of TRI chemicals. Materials sent off-site for direct reuse are considered processed, similar to how the materials that are incorporated into your product are processed. Therefore, quantities of a TRI chemical sent offsite for direct reuse are not reported on the TRI form as an offsite transfer – they are not included anywhere on the Form R as a release or managed as waste – just as chemicals in the end-product are not included anywhere on the Form R. Off-site recycling, however, is reported on the TRI Form R.
Slide 32 **Section V: Form A Eligibility** Duration: 00:00:05		**Notes:**

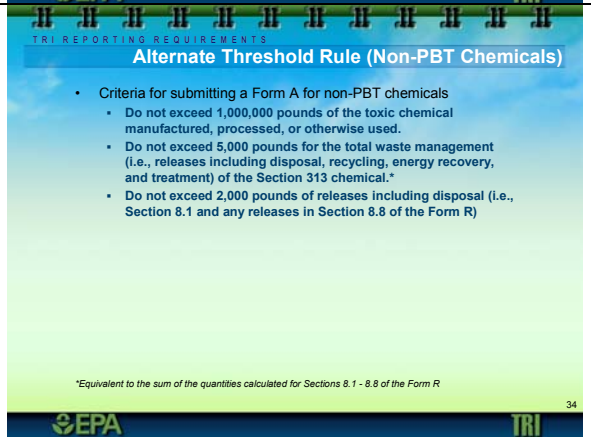
Slide 33
Form A Eligibility
Duration: 00:00:45



Notes:

The alternative threshold rule – as described in the Basic Concepts Module of this online training – was new for reporting year 2006. This ruled expanded the eligibility for the use of the Form A certification. On a chemical-by-chemical basis, if a facility meets the criteria for using a Form A, they can file it instead of a Form R; they do not need to file a Form R. The Form A can provide significant burden reduction because it does not require release or other waste management or source reduction information. It mainly is comprised of Part one of the Form R and the name and the CAS number of the chemical.

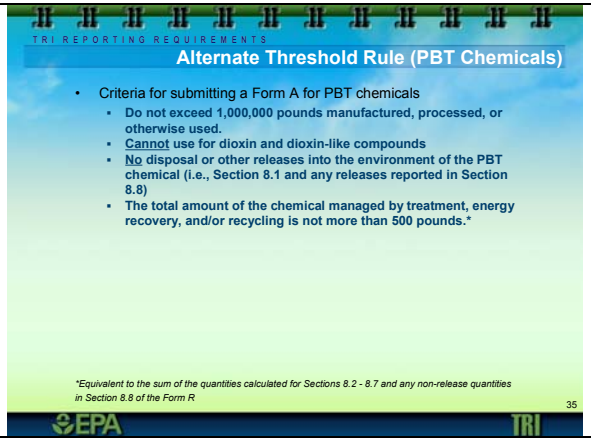
Slide 34
Alternate Threshold Rule (Non-PBT Chemicals)
Duration: 00:00:48



Notes:

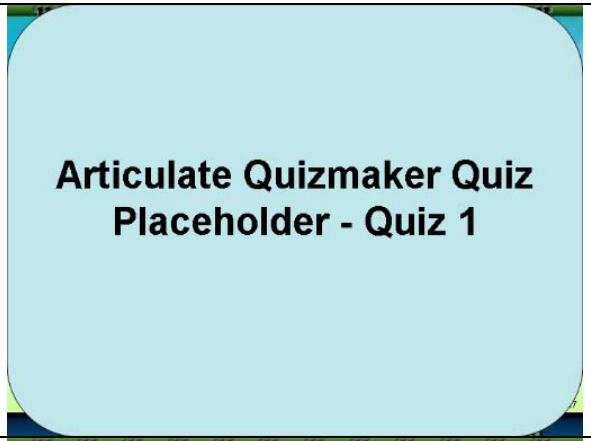
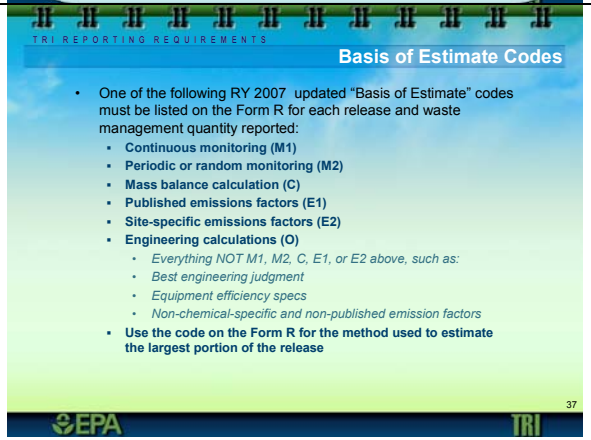
The criteria for use of Form A varies depending on whether or not the chemical is PBT chemical or not. For non-PBT chemicals, in order to use the Form A, a facility must meet the following criteria. First, the facility cannot exceed one million pounds of the chemical manufactured, processed, or otherwise used. Second, the facility cannot exceed 5,000 pounds for the total waste management of the TRI chemical. And by waste management, again, we mean the releases, recycling, energy recovery, and treatment of the TRI chemical. And the facility cannot exceed 2,000 pounds of the TRI chemical released or disposed.

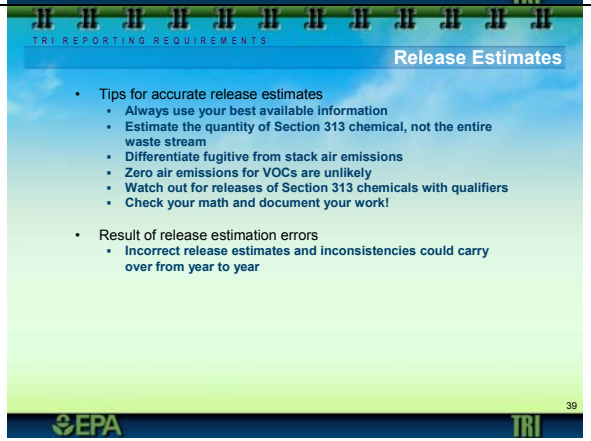
Slide 35
Alternate Threshold Rule (PBT Chemicals)
Duration: 00:00:46



Notes:

In previous years, Form A was not allowed for PBT chemicals. Starting in reporting year 2006, the Form A can be used for PBT chemicals, provided the following criteria are met. First, the facility cannot exceed one million pounds of the TRI chemical, manufactured, processed, or otherwise used. Second, it cannot be used for dioxin and dioxin-like compounds. Third, there can be no releases or other disposal into the environment of the PBT chemical. And fourth, facilities cannot exceed 500 pounds for recycling, energy recovery, and treatment of the TRI chemical.

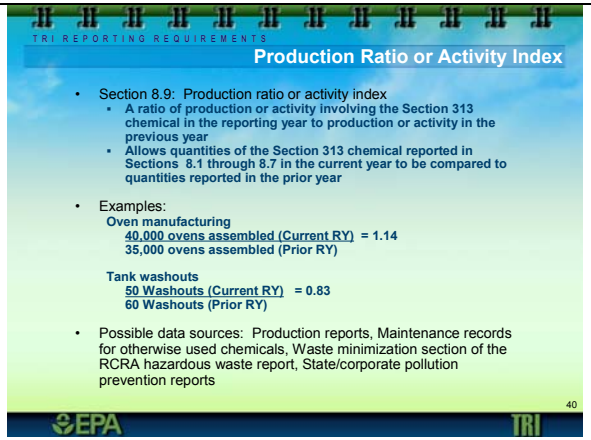
Slide 36 **Quiz 1** Duration: 00:02:00		
Slide 37 **Basis of Estimate Codes** Duration: 00:01:31		**Notes:** For each chemical quantity entered in Sections 5 and 6 of the Form R, facilities much also indicate how the quantity was estimated by entering a "basis of estimate" code. Note that beginning in RY2007, the number of basis of estimates codes has increased to the six shown here. Is the estimate based on data from a continuous monitoring system? If so, enter a Basis of Estimate code of M1. Enter "M2" if the estimate is based upon periodic or random monitoring. Is the estimate based on a mass balance calculation? That would be a Basis of Estimate Code of C. If the quantity is based on a published emission factor, then enter "E1" as the Basis of Estimate code. E2 is for site-specific emissions factors that are non-published, that were perhaps developed through in-house testing, or were provided by the vendor of your process or pollution control equipment. The last code, "O", is for "other" and is used for engineering calculations. O is also any other method that is not covered by the other codes. In some cases, the quantity entered on the TRI Form could be based on multiple estimation techniques. In these cases, enter the basis of estimate code that represents the largest portion of the estimate.

Slide 38 **Section VI: Release and Waste Management Reporting Guidance** Duration: 00:00:05		**Notes:**
Slide 39 **Release and Waste Management Reporting Guidance** Duration: 00:01:22		**Notes:** Here are a few helpful hints for estimating release and waste management quantities reported on the Form R. First, consider all sources of information and use the best available information for release and waste management estimates. Be sure to estimate the quantity of the TRI chemical and not the entire waste stream. For example, when using data from a waste manifest that shows the weight of the entire waste mixture sent off-site, be sure to base release and waste management estimates on only the amount of the TRI chemical in that waste mixture. Be sure to differentiate between your fugitive and your stack air emissions. When reporting for a VOC, or volatile organic compound, be sure to estimate fugitive losses of the chemical – it is unlikely to have zero fugitive air emissions. Pay attention to the TRI chemical qualifiers and remember that the form of the chemical described in the qualifier is the only form that needs to be considered for TRI. Also, always check your math and document your work. Be aware that errors can carry over from year to year.

Slide 40

Production Ratio or Activity Index

Duration: 00:03:43



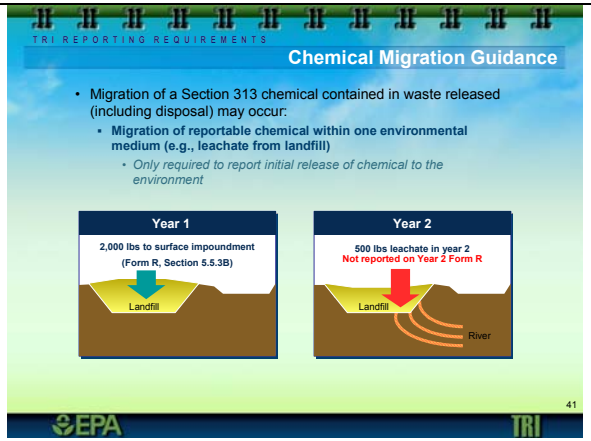
Notes:

The production ratio or activity index for the chemical goes in Section 8.9 of the Form R. The production ratio is a unitless value that compares this year's production involving this chemical to last year's production. This helps facilities examine trends in their quantities released and managed. For example, releases could be decreasing over time because pollution prevention is being implemented resulting in increased efficiency. Or releases could be decreasing because production is going down. Let's go through a couple of examples to illustrate this.

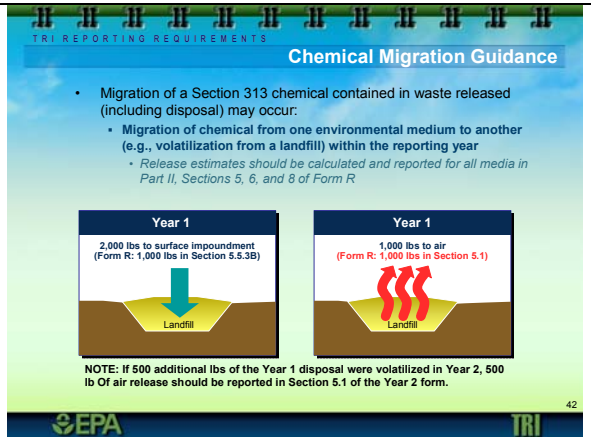
The first example is an oven manufacturer, and at this facility 40,000 ovens were assembled this reporting year, compared to 35,000 ovens assembled in the prior reporting year. So dividing 40,000 by 35,000 results in a production ratio of 1.14. This is a unitless value. 1.14 would represent a 14% increase in production from last year to this year. But neither 14, or 0.14 should be reported. Only 1.14, the actual ratio, should be reported. Perhaps the TRI chemical use has no connection to production. Alternatively, facilities may use an activity index instead of a production ratio. In the activity index example shown here, a chemical is used in tank washouts. There were 50 washouts this year compared to 60 the last year. That would result in an activity index of 0.83.

The facility must decide if a production ratio or an activity index best reflects the use of the chemical for which they are reporting. For example, if the facility is reporting on a chemical that is in the paint used to paint ovens, using the number of ovens would be a good production ratio. As they make more ovens, they are going to be using proportionally more of the paint, if they do not implement any pollution prevention practices. However, if the chemical is used in a cleaning solution to clean tanks, it may be that the facility is increasing production by running larger jobs that require fewer cleanings. Production is not a good indicator of the year-to-year use of that chemical, so they would opt for using an activity index instead.

If a facility does implement pollution prevention practices, they still may see their chemical use remain the same even though their production ratio is greater than one, meaning their production is going up. That would indicate they are using less of the chemical per unit of product.

Slide 40 - Continued **Production Ratio or Activity Index** Duration: 00:03:43		**Notes:** Another note, this number can never be negative (since we are dividing two positive numbers). If production is going up, the production ratio is going to be greater than one. If production is going down, the production ratio or activity index is going to be less than one, as in the tank washout example. Barring significant changes in production or activities at a facility, most production ratios and activity indexes are within 0.5 and 2, which would indicate a 50 percent decrease and a 100 percent increase in production or activities, respectively.
Slide 41 **Chemical Migration Guidance** Duration: 00:01:00		**Notes:** Now we will discuss EPA's Interpretive Guidance on how to report chemicals that migrate between media. Shown is an example of a reportable chemical that is disposed of in an on-site surface impoundment. In Year One, 2000 pounds of this chemical were disposed of in the on-site surface impoundment. That 2000 pounds will go on your Form R as an onsite land disposal, under the surface impoundment section. A year later, leachate from this surface impoundment has migrated to the river, and you know that 500 pounds of the original 2000 pounds has migrated to the river. Because the migration occurred in a different reporting year, the 500 pounds to water does not go on your Form as a direct discharge. The 500 pounds does not go on the Year Two Form at all. It was already reported the previous year in the 2000 pounds disposed to land onsite.

Slide 42
Chemical Migration Guidance
Duration: 00:01:12



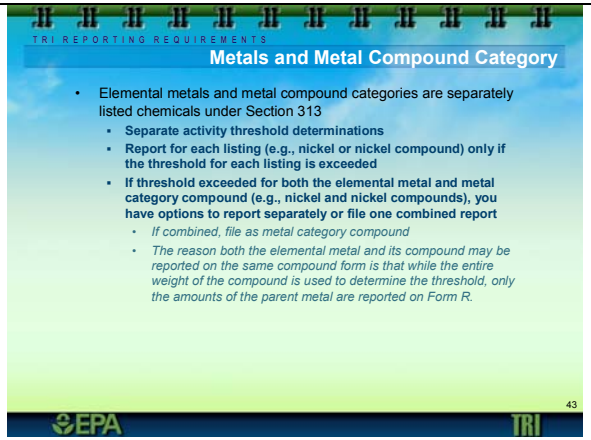
Notes:

On the other hand, if in Year One, a facility placed 2,000 pounds of the chemical into a surface impoundment, and in the same year, 1,000 pounds volatilized to the air, the facility would put the 1,000 pounds to air on their Form R as an air release. And 1,000 pounds would be reported on the Form R as disposed of in the surface impoundment, not 2000 pounds.

When the initial disposal and subsequent migration occur during the same reporting year, they are able to put each amount in the appropriate section of the form to show the medium that it actually ended up in.

Also, note that when a TRI chemical migrates from one environmental medium to another (for example, from land to air) in different years, the quantity of TRI chemical migrating to the different environmental medium should be estimated and reported on the TRI Form. This is the case even if some or all of that chemical had already been reported as being disposed or released to the original medium in previous years.

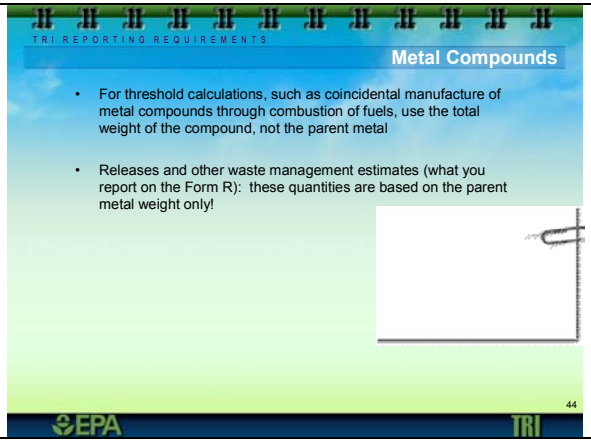
Slide 43
Metals and Metal Compound Category
Duration: 00:01:47

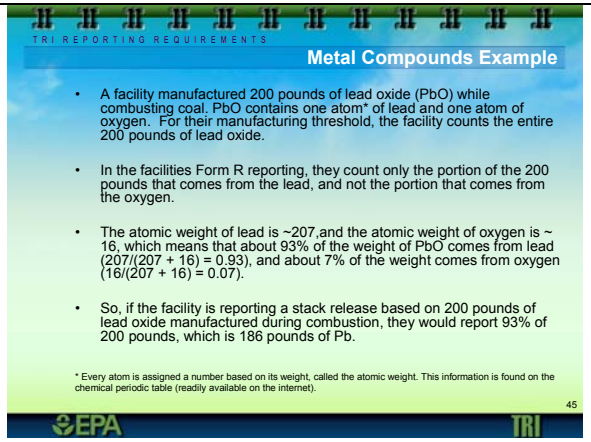
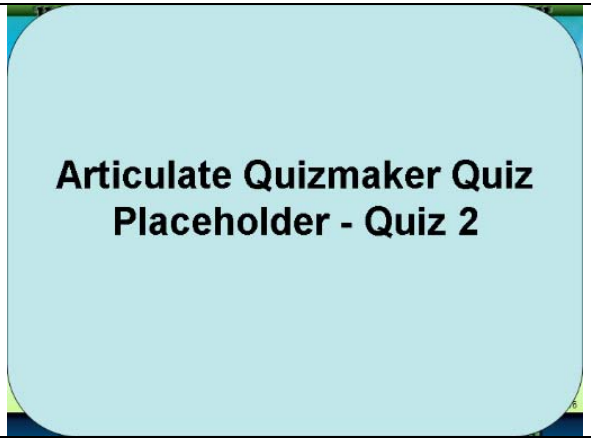


Notes:

Now let's look at the unique requirements associated with reporting for metals and metal compound categories. Note that metals and metal compound category are separately listed chemicals under TRI. They each have a separate activity threshold determination – report on the metal only if the threshold for the metal is exceeded, and report for the metal compound only if the threshold for the metal compound is exceeded.

So if a facility handles elemental nickel and nickel compounds at their facility, they should look at the two separately when determining if they need to report. They look at the elemental nickel and see if they manufacture, process, or otherwise use quantities exceeding the threshold for nickel. Separately, they look at their nickel compounds and see if the quantity manufactured, processed, or otherwise used exceeds the threshold for nickel compounds. They look at the two as completely unrelated chemicals.

Slide 43 - Continued **Metals and Metal Compound Category** Duration: 00:01:47		**Notes:** However, if the threshold is exceeded for both the elemental metal and for the metal compound – for example, both for nickel and for nickel compounds, then the option exists to either report separately or to file in one combined form. When combining the reports, the single report should be for the metal compound category. So, if the facility exceeded the threshold for nickel and they exceeded the threshold for nickel compounds, they could file for each separately, or they could file for the combined elemental nickel releases and releases from the nickel compounds on one report.
Slide 44 **Metal Compounds** Duration: 00:00:28		**Notes:** When determining threshold quantities for metal compounds, use the total weight of the compound, not just the parent metal portion. In other words, when calculating how much of the metal compound was manufactured or processed or otherwise used, use the weight of the compound as a whole. For release and other waste management estimates – that's the information that goes on the Form R – use just the weight of the parent metal.

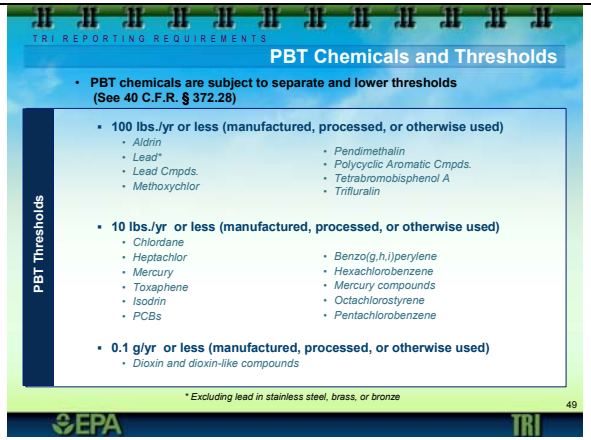
Slide 45 **Metal Compounds Example** Duration: 00:01:18		**Notes:** Let's look at an example where a facility coincidentally manufactured 200 pounds of lead oxide during the combustion of coal. First, they check to see if they have exceeded a threshold. They count the entire 200 pounds of lead oxide, not just the parent metal lead, towards their manufacturing threshold for lead compounds. Because the threshold is 100 pounds, they have exceeded the reporting threshold and will have to submit a TRI form for lead compounds. Now, when estimating the quantities of TRI chemical managed as waste for the TRI form R, they only report the quantity of lead contained in the lead compounds. Using the atomic weight of lead, which is about 207, and that of oxygen, which is about 16, they determine that the lead makes up 93% of the weight of the lead oxide. Therefore, if the facility determines that all 200 pounds of the lead oxide was released up the stack, they would report 93% of 200 pounds, or 186 pounds as a stack release on their TRI Form R.
Slide 46 **Quiz 2** Duration: 00:02:00		

Slide 47 **Metal Cyanide Compounds Guidance** Duration: 00:01:10		**Notes:** "Metal cyanide compounds" is a chemical category on the TRI list. Facilities that manufacture, process, or otherwise use a metal cyanide compound, need to consider if they exceed the threshold under the metal cyanide compound category and also under the corresponding metal compound category. For example, if a facility processes cadmium cyanide, they need to consider if reporting is required under both cadmium compounds and cyanide compounds. In this example, they would use the entire weight of the cadmium cyanide for the cadmium compound category threshold determination and only the weight of the metal portion, or cadmium, for the release and waste management reporting. For reporting under the cyanide compounds category, they would also use the entire weight for the cadmium cyanide in the threshold determination, just like for the metal compound. For the release and other waste management, they also use the entire weight of the cadmium cyanide, unlike when reporting under the metal compound category.
Slide 48 **Section VII: PBT and Chemicals for Special Consideration** Duration: 00:00:05		**Notes:**

Slide 49

PBT and Chemicals for Special Consideration

Duration: 00:01:34



Notes:

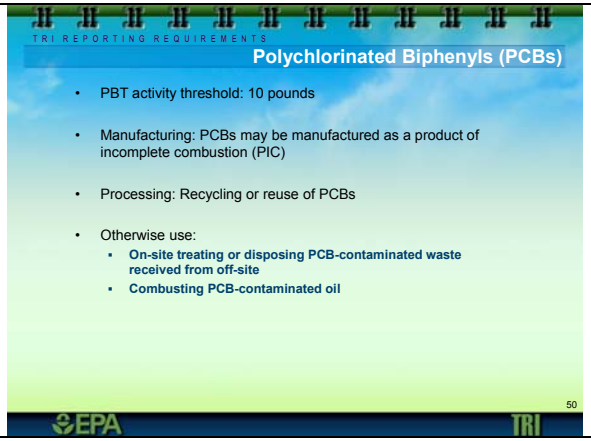
PBT chemicals are those chemicals that are persistent bioaccumulative and toxic, meaning that they're persistent in that they don't break down in the environment. They're bioaccumulative in that they tend to accumulate in living tissue, and they're toxic chemicals. So because of these characteristics, these chemicals have unique reporting requirements under TRI.

Here are the 20 chemicals that are designated as PBTs. 8 of them are pesticides, 8 are aromatic compounds, 2 are metals and 2 are metal compounds. Several of these PBT chemicals are either banned or severely limited in their use. There are different thresholds depending on whether or not the chemical is "highly" persistent, bioaccumulative and toxic. Those chemicals have a 10 lb/year reporting threshold. That category includes mercury and PCBs. A 100 lb/year threshold applies to another group of PBTs shown here. Lastly, dioxin and dioxin-like compounds have a reporting threshold on 0.1 gram per year.
This is the only place in TRI reporting where you'll see a unit other than pounds. Dioxin is reported in grams and the threshold is in grams. Everywhere else in TRI, the units are "pounds."

Slide 50

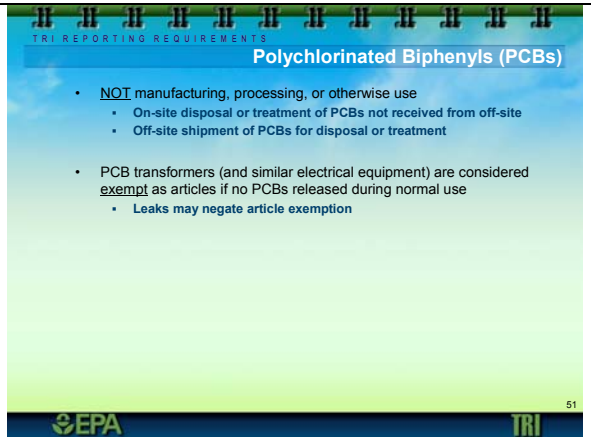
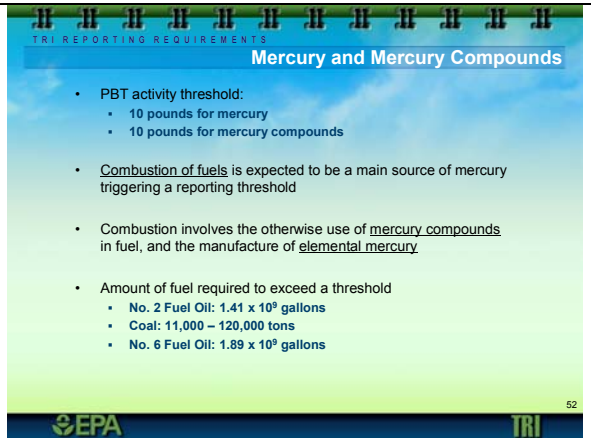
Polychlorinated Biphenyls (PCBs)

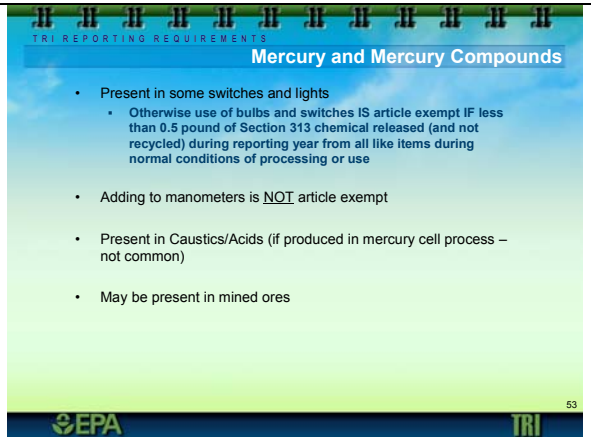
Duration: 00:00:43



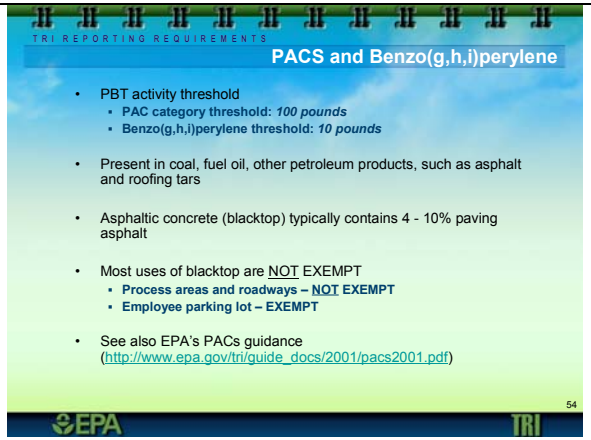
Notes:

Polychlorinated Biphenyls (PCB's) have a reporting threshold of 10 pounds. Facilities should considered where in their process that they may be using or generating PCBs. PCBs can be manufactured as a byproduct of incomplete combustion. Be aware that recycling of PCBs is considered processing. Also, using PCBs by: adding them into your process equipment; treating them on-site; or disposing of PCB-contaminated waste received from off-site – or combusting PCB-contaminated oil; are all counted towards the otherwise use threshold.

Slide 51 **Polychlorinated Biphenyls (PCBs)** Duration: 00:01:11		**Notes:** Many facilities ask about how they should report when they ship an old PCB-containing transformer offsite for disposal. PCB transformers are considered exempt as articles if no PCB's are released during their normal use. Note that leaks may negate that article exemption. Also, shipping a product offsite for disposal is not a manufacturing, processing or otherwise use activity– in other words, it is not a threshold activity. Other activities that are not threshold activities include on-site disposal or treatment of PCBs not received from off-site or the off-site shipment of PCB's for disposal or treatment. So, facilities with old transformers that contain PCBs, and that are just getting rid of them by sending them off-site for disposal, would not need to report on the PCBs, assuming they had no other sources of PCBs at the facility. Just shipping a waste off-site for the purposes of further waste management is not a threshold activity.
Slide 52 **Mercury and Mercury Compounds** Duration: 00:02:24		**Notes:** Next are mercury and mercury compounds. The PBT activity threshold is 10 pounds for mercury and it is 10 pounds for mercury compounds. Recall that mercury and mercury compounds are two separately listed TRI chemicals. The combustion of fuels is the main source of mercury triggering reporting to TRI. Combustion typically involves the otherwise use of mercury compounds in fuels and the manufacture of elemental mercury. If you do not know the mercury compound present in a fuel, EPA recommends using mercurous oxide for threshold calculations of otherwise use. In the absence of better information, EPA also recommends that facilities assume that all releases and other waste management quantities of mercury from the combustion of coal are in the form of elemental mercury. Combustion involves the otherwise use of mercury compounds in fuels and the manufacture of elemental mercury.EPA has developed a mercury guidance document that provides the amounts of fuels required to exceed the 10 pound threshold for typical concentrations of mercury in those fuels.

Slide 52 - Continued **Mercury and Mercury Compounds** Duration: 00:02:24		**Notes:** However, if a facility has better, more specific information on the fuel that they are actually using, they should base their calculations on that information. If they do not have other information, they can use the default information in the mercury guidance. Some information from that guidance document is shown here. For example, in the case of No. 2 fuel oil, you would need to use about 1.41 billion gallons of Number 2 fuel oil to exceed the reporting threshold, IF the concentration of mercury in the fuel oil was 1 part per Billion. For Number 6 fuel oil, it would take about 1.89 billion gallons. So, this helps give a sense of whether reporting might be required. Alternatively, if the uses of these fuels is not even close to these quantities and there are no other sources of mercury at the facility, reporting would probably not be required.
Slide 53 **Mercury and Mercury Compounds** Duration: 00:01:10		**Notes:** Here are a few other things to consider regarding mercury. In addition to petroleum products, mercury and mercury compounds might be found in switches and lights. Note, however, that the otherwise use of bulbs and switches would be exempt as an article if you are not a bulb or switch manufacturer AND less than half a pound of the mercury is released during the reporting year from all like items during normal conditions of processing or use. For example, if a facility purchases and installs mercury switches in a piece of equipment that they manufacture, it would likely meet the article exemption, as long as they did not have releases associated all the switches that totaled more than half a pound a year. If mercury is being added to an instrument, that would not be covered by the article exemption. Facilities should also be aware that mercury might be present in caustics and acids – if it is produced using the mercury cell process, which is not now common. In addition, mined ores may be another source of mercury.

Slide 54
PACS and Benzo(g,h,i)perylene
Duration: 00:01:19



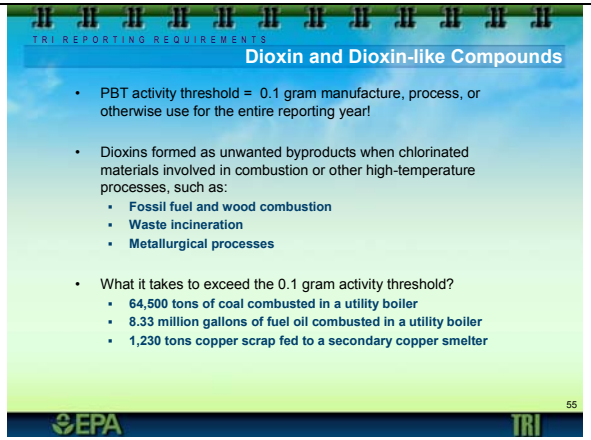
Notes:

PACS and Benzo(g,h,i)perylene are both PBT's. The PACS have a 100 pound threshold. The Benzo(g,h,i)perylene has a 10 pound threshold. These chemicals are usually found in the same sources including in coal, fuel oil, petroleum products, and roofing tars. These chemicals can also be coincidentally manufactured during the combustion of fossil fuels.

Because they are found in asphalt, they are typically present in blacktop. Blacktop used for paving an employee parking lot is exempt under the structural exemption, but other uses of blacktop at a facility probably are not because these uses are process-related. For example, blacktop used for roadways that trucks use to bring materials in and product out of the facility would not be exempt.

Again, as with most of the PBT chemicals, EPA has developed a guidance document that provides much more information on PACs and Benzo(g,h,I)perylene along with specific examples that will help facilities determine their requirements associated with these chemicals.

Slide 55
Dioxin and Dioxin-like Compounds
Duration: 00:01:28

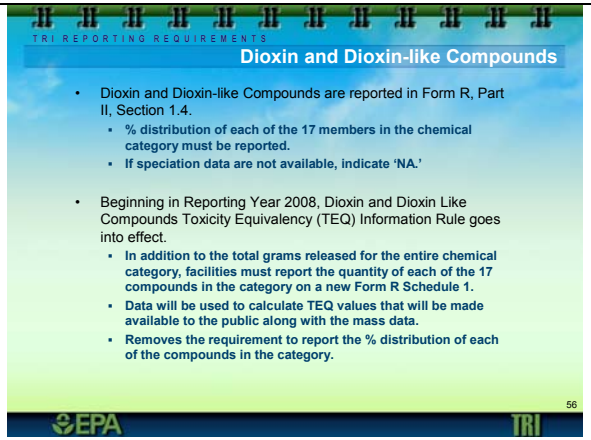


Notes:

"Dioxin and Dioxin-like Compounds" is a category of PBTs. The category has a PBT activity threshold of 0.1 grams for a reporting year. Facilities manufacturing, processing or otherwise using 1/10th of a gram of dioxin or dioxin-like compounds, would report for this chemical category. Dioxins can be formed as byproducts when chlorinated materials are involved in combustion or other high-temperature processes. Examples of such processes where dioxins may form include: fossil fuel and wood combustion, waste incineration, or metallurgical processes.

What does it take to exceed a 0.1 gram activity threshold? The list shown here is from the dioxin and dioxin-like compounds guidance document. Using typical concentrations, 64,500 tons of coal combusted in a utility boiler in the reporting year would exceed the dioxin threshold. 8.33 million gallons of fuel combusted would exceed the threshold, again, at typical concentrations of dioxins in the fuel. Or 1,230 tons of copper scrap fed into a secondary copper smelter would exceed the dioxin threshold.

Slide 56
Dioxin and Dioxin-like Compounds
Duration: 00:01:00

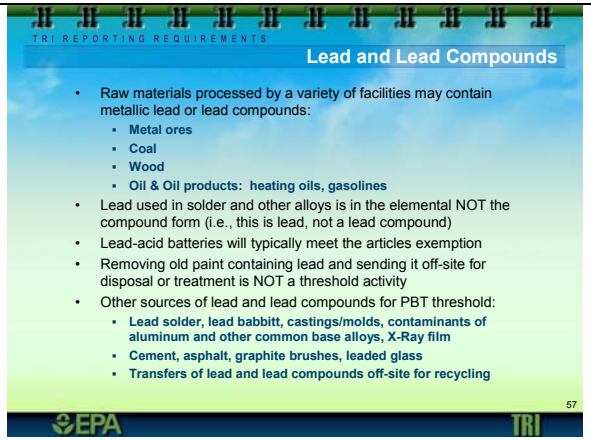


Notes:

When completing a TRI Form R for dioxin and dioxin-like compounds, note that Section 1.4 of Part two of the form needs to be completed. This section of the form is used when reporting on this chemical category. In this section, facilities report the % distribution of each of the 17 individual chemicals in the chemical category.

For reporting year 2008, there will be changes related to the reporting of dioxin and dioxin-like compounds. In addition to reporting on the grams of the chemical category managed as waste, facilities must report the quantity of each of the 17 compounds in the category on a new Form R Schedule 1. These data will be used to calculate toxicity equivalency values, which will be made available to the public along with the actual weights.

Slide 57
Lead and Lead Compounds
Duration: 00:01:41



Notes:

"Lead and Lead Compounds" – this is the most commonly reported TRI chemical. It is found in a variety of raw materials, such as in metal ores, coal, wood, and in oil products such as heating oils and gasoline.

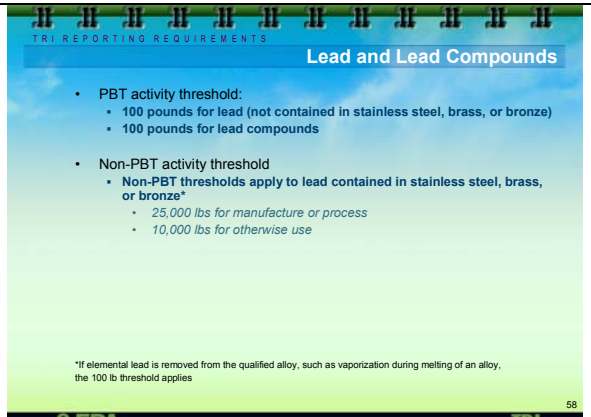
Lead is also found in circuit board facilities where it is used as solder. And, lead is found in many metal alloys. Lead in solder and alloys is in the elemental, not the compound form. So, facilities using lead solder and metal alloys should consider the quantities of elemental lead in these materials. Lead acid batteries would typically meet the articles exemption, assuming there are no TRI chemical releases associated with the lead acid batteries.

Old paint can also contain lead. However, removing old paint containing lead and sending it off-site for disposal or treatment is not considered a threshold activity under TRI. Simply transferring a waste containing a TRI chemical off-site for waste management other than recycling is not in itself a threshold activity.
Other sources of lead and lead compounds that facilities should consider: lead as contaminants in aluminum or other base alloys. Lead in X-ray film, cement, asphalt, graphite brushes, and leaded glass. Also, transferring of lead or lead compounds off-site for recycling is counted as processing.

Slide 58

Lead and Lead Compounds

Duration: 00:00:39



Notes:

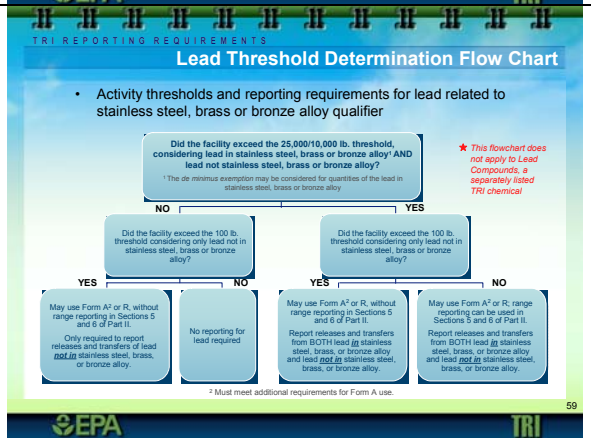
Elemental lead that is not contained in stainless steel, brass or bronze alloys is considered a PBT and has a 100 pound threshold. The lead compounds category always has a 100-pound threshold.

There is also a non-PBT activity threshold for lead and that applies only to lead that is contained in stainless steel, brass, or bronze. In this case the non-PBT chemical thresholds apply, or 25,000 pounds for manufacturing and processing, and 10,000 pounds for otherwise use.

Slide 59

Lead Threshold Determination Flow Chart

Duration: 00:01:53

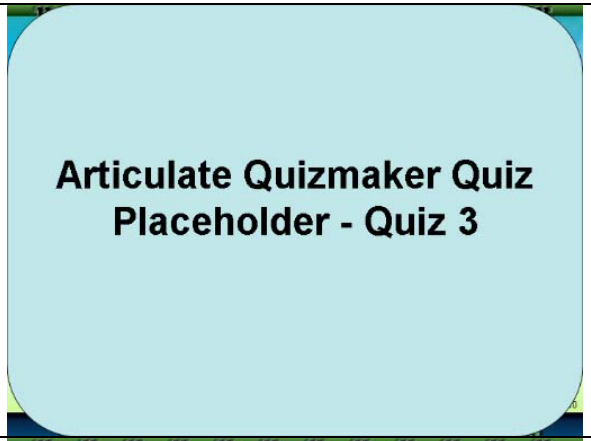
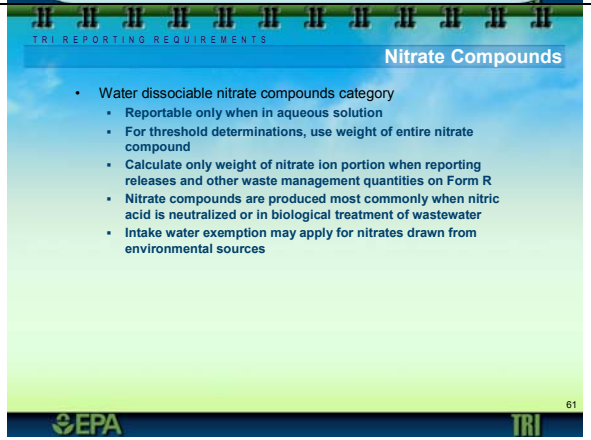


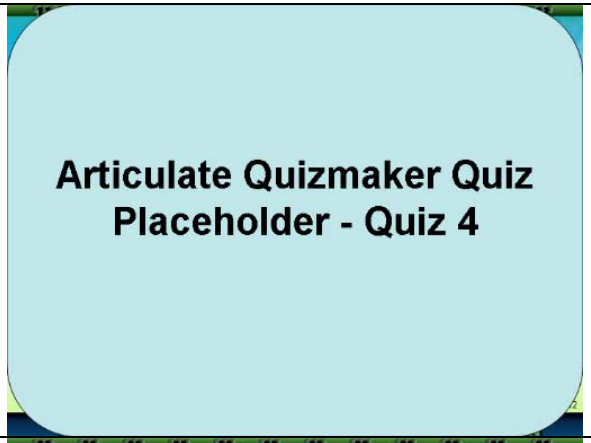
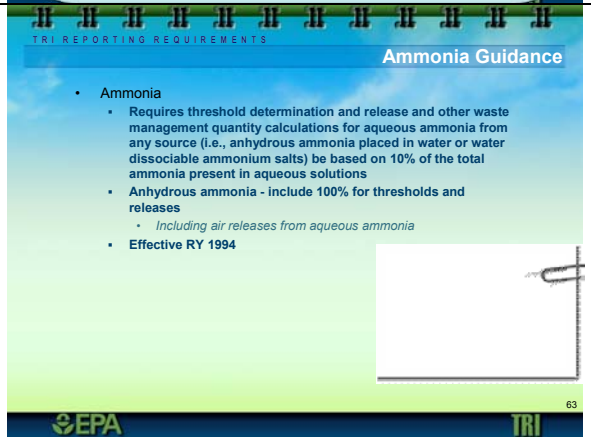
Notes:

Because there are two different ways to look at lead, for facilities that have both lead in stainless steel, brass and bronze, AND lead not in these alloys, this flowchart can be helpful in determining which thresholds have been exceeded and what reporting requirements apply.

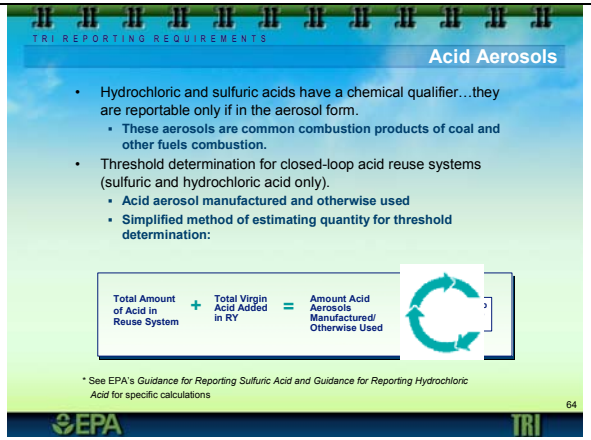
The first step is to quantify all of the lead manufactured processed or otherwise used at the facility, including lead in stainless steel, brass or bronze and lead in the PBT form and compare that to the non-PBT thresholds of 25,000 and 10,000 pounds. Then the facility looks only at lead not in stainless steel, brass, or bronze and compares that to the 100 pound threshold for the PBT form of lead.

Following this flow chart, if neither threshold is exceeded, then no reporting is required. If only the threshold for the PBT form of lead is exceeded then the facility is only required to report on the lead not in stainless steel, brass, or bronze and must follow the reporting requirement specific to PBT chemicals. If only the threshold for the non-PBT form of lead is exceeded, then the facility reports on both the lead in the stainless steel, brass or bronze and the lead not in these alloys, and they follow the reporting requirements for non-PBT chemicals. Finally, if both the thresholds for the PBT form of lead and the threshold for the non-PBT form of lead are exceeded, then the flowchart shows that the facility must report on both forms of lead and must follow the reporting requirements for PBT chemicals.

Slide 60 **Quiz 3** Duration: 00:02:00		
Slide 61 **Nitrate Compounds** Duration: 00:01:37		**Notes:** Now we will move on to some other chemicals that, while not PBT chemicals, have either unique reporting requirements or for which reporting errors more frequently occur. First, let's look at the nitrate compounds category. The TRI chemical category is actually 'water dissociable nitrate compounds'. So, nitrate compounds are only reportable when they are in an aqueous solution. Nitrate compounds are treated much like metal compounds under TRI. When calculating whether a reporting threshold was exceeded, facilities use the weight of the entire nitrate compound to see if they have manufactured or processed more than 25,000 pounds, or otherwise used more than 10,000 pounds. If one of these thresholds is exceeded, a TRI form is required. When estimating the quantities released or managed as waste, use only the nitrate ion portion of the compound. A common error is using the whole weight of the nitrate compound in the release and waste management estimates, and thereby, over-reporting the pounds released or the pounds managed as waste. Nitrate compounds are most commonly produced when nitric acid is neutralized, or in biological treatment of wastewater. There is an exemption for intake water – nitrates drawn from environmental sources or from city water are exempt.

Slide 62 **Quiz 4** Duration: 00:02:00		
Slide 63 **Ammonia Guidance** Duration: 00:01:11		**Notes:** Ammonia also has some unique requirements. For aqueous ammonia, threshold determinations and release and waste management quantity calculations are based on 10% of the ammonia present in the aqueous solutions. Remember that the 10% applies only to aqueous solutions. In the case of anhydrous ammonia, facilities need to consider 100% for thresholds and releases. Let's look at an example. If in a calendar year, a facility places 20,000 lbs of anhydrous ammonia in water for processing and processes 25,000 lbs of aqueous ammonia from an ammonium salt. The facility must include all of the 20,000 lbs of anhydrous ammonia in the determination of the processing threshold, but only 10 percent (or 2,500 lbs) of the aqueous ammonia from the ammonium salt in the processing threshold determination. Therefore, total ammonia processed is 22,500 pounds which is below the reporting threshold.

Slide 64
Acid Aerosols
Duration: 00:01:44



Notes:

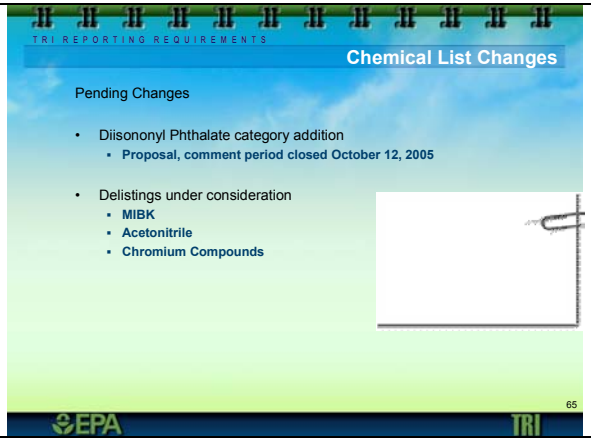
Acid aerosols are also chemicals with unique requirements. Note that both hydrochloric and sulfuric acids have a chemical qualifier that specifies that they are reportable only if they are in the aerosol form. These aerosols are common products of coal and other fuel combustion. For example, sulfuric acid can be coincidentally manufactured when combusting fuels containing sulfur.

Hydrochloric and sulfuric acids are also used by facilities in closed-loop acid reuse systems. In some cases the acid can be aerosolized to apply it to a material or product for the purpose of etching or cleaning. The acid aerosol is typically condenced back to liquid only to be reaerosolized again and again. Because of the chemical qualifier, facilities would be manufacturing the TRI chemical every time it is aerosolized and otherwise using it again and again in the process.

EPA developed a simplified method for estimating the quantity that should be applied to the threshold. The guidance directs facilities to calculate their threshold quantity by adding the total amount of acid in the reuse system plus the total virgin acid added in the reporting year to get the threshold quantity manufactured and otherwise used.

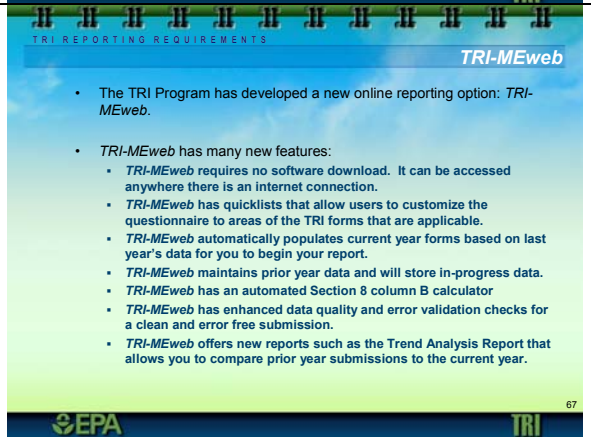
EPA has developed two separate reporting guidance documents for sulfuric acid and hydrochloric acid where facilities can get more information pertaining to these chemicals.

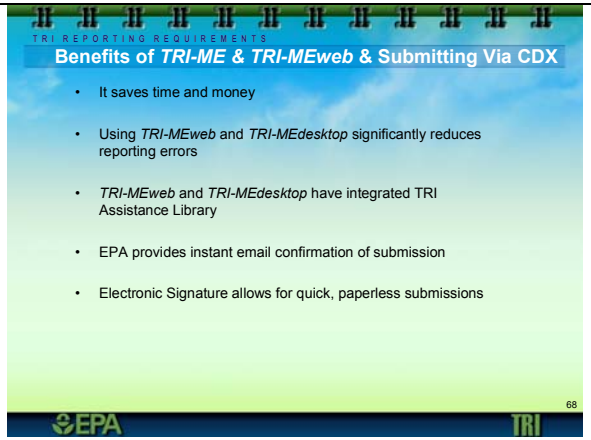
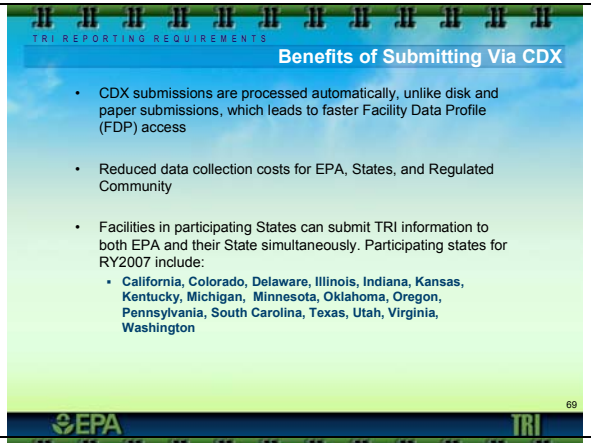
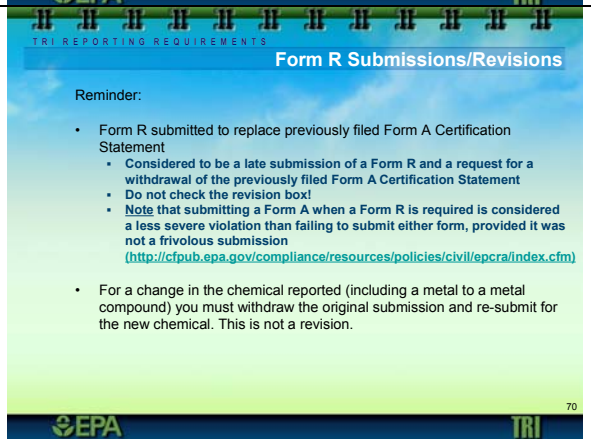
Slide 65
Chemical List Changes
Duration: 00:00:36

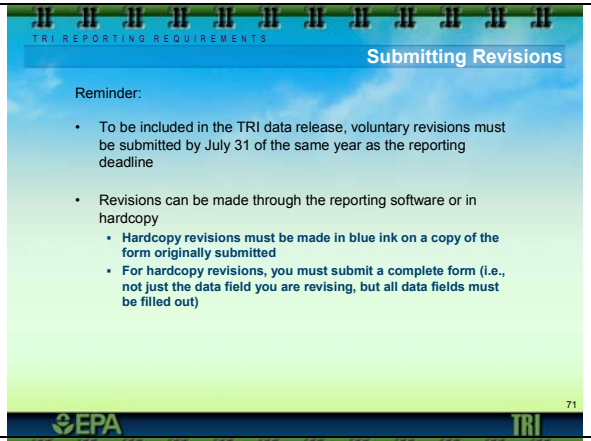
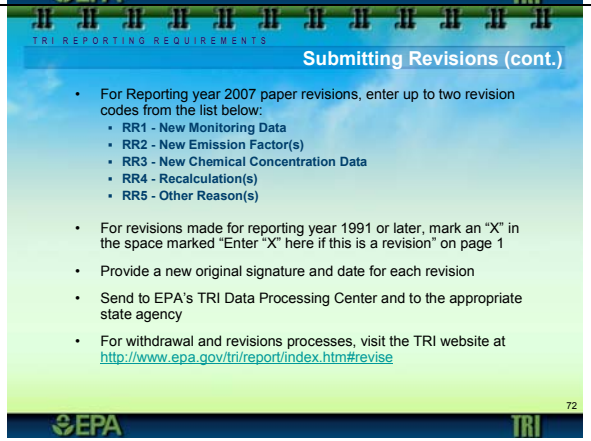


Notes:

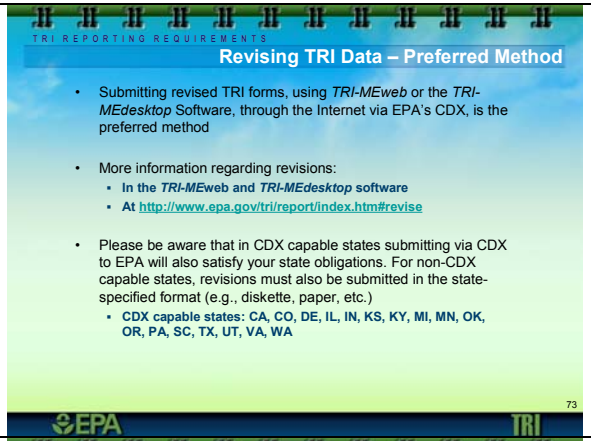
The TRI chemical list includes over 600 chemicals and chemical categories. Periodically, there are changes to the list, so it's important to check for updates every year. There are no new chemical list changes specific to reporting year 2007. As for other pending changes – there is a chemical category addition under consideration. And petitions have been submitted for EPA to consider several other delistings. None of these are final at this point. They're just under consideration.

Slide 66 **Section VIII: TRI Program Information** Duration: 00:00:05		**Notes:**
Slide 67 **TRI Program Information** Duration: 00:01:05		**Notes:** TRI Program is developing a new online reporting option called TRI-MEweb. This is in addition to TRI-ME desktop software that many TRI covered facilities are familiar with and which is still available for download from the TRI website. TRI-MEweb is a web application that will have much the same functionality of the TRI-ME software and a number of new features. It will automatically populate current year forms, based on your last year's data, so you can start out with that information. It has enhanced data quality and error validation checks that will help to make sure you submit a clean and error-free report. And it has a few tools that you can use such as a Trends Analysis Report that allows you to compare your prior year submissions to the current year form. TRI-MEweb and regular TRI-ME software are both available from the TRI Website.

Slide 68 **Benefits of TRI-ME & TRI-MEweb & Submitting Via CDX** Duration: 00:00:54		**Notes:** EPA would like to encourage the use of TRI-ME desktop and TRI-ME web reporting applications and the submittal of TRI reports via EPA's Central Data Exchange. It saves time and money for the reporting facilities and for the EPA. Both TRI-ME desktop and TRI-ME web have the TRI assistance library integrated within the software so that facilities have ready access to information and guidance. Using the TRI-ME software has been proven to significantly reduce reporting errors. When submitting via the CDX, facilities receive instant e-mail confirmation that EPA has received their submission. And submitting via the CDX uses an electronic signature that will allow for paperless submission.
Slide 69 **Benefits of Submitting Via CDX** Duration: 00:00:32		**Notes:** Submissions via the CDX are processed automatically, unlike the disk and paper submission, which means you receive your facility data profile much faster. Again, it reduces the cost of data collections for EPA, the state, as well as facilities and companies that need to report to TRI. For facilities in those states that are CDX capable, a submittal of their TRI forms to EPA automatically fulfills their state obligations.
Slide 70 **Form R Submissions/Revisions** Duration: 00:00:55		**Notes:** Here are a few more reminders regarding revisions and withdrawals. If submitting a Form R to replace a previously filed Form A, this is not considered a revision (do not check the revision box). It is considered a late submission of Form R. You would also need to request that the Form A be withdrawn.Note that submitting a Form A when a Form R is required is considered a less severe violation than failing to submit either form, but it is considered a late submission. A common revision is to change the chemical reported from a metal to a metal compound or vice versa. In that case the original submission must be withdrawn and the form for the new chemical should be submitted. This is not considered a revision.

Slide 71 **Submitting Revisions** Duration: 00:00:44		**Notes:** Here are some reminders related to submitting TRI revisions. If, at any time, a facility finds there has been a reporting error, they can submit a revision. If it is a recent error, it can be corrected before the public release of the TRI data for that year if it is submitted by July 31st of the same year that the original report was submitted. If the revision is submitted after that, the revision will still go through; however, it would likely show up in subsequent data releases. Revisions can be made through the TRI-ME desktop and TRI-ME web applications, or in hardcopy, with the TRI-ME software being the preferred method.
Slide 72 **Submitting Revisions (cont.)** Duration: 00:00:47		**Notes:** To make a revision, you must submit a new complete form, not just the data field you are revising. For paper submittals, prior to reporting year 2007, there is a check box to indicate that this is a revision that is being submitted. For 2007, facilities will enter up to two of the revisions codes shown here indicating the reason for the revision. Facilities need to re-certify each revision submission and they need to be submitted to EPA's Data Processing Center and to the appropriate state agency. Additional information on revisions, and also on withdrawing data, are available on the TRI website.

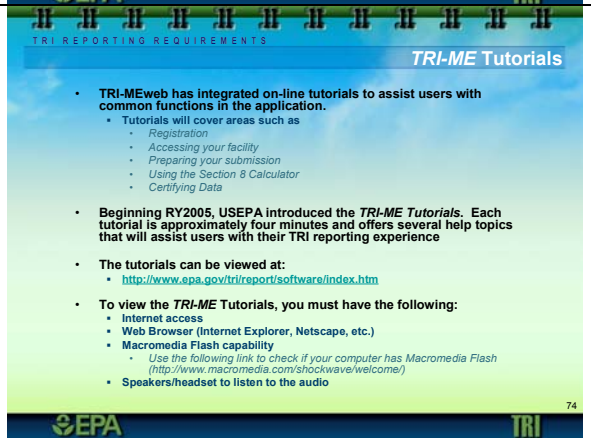
Slide 73
Revising TRI Data – Preferred Method
Duration: 00:00:33



Notes:

The preferred method for submitting revisions is electronically using the TRI-ME software through the Internet via EPA's central data exchange. Be aware that when submitting via the central data exchange to EPA, it will satisfy your state obligations only for states that are CDX-capable shown here. For states that are not yet CDX-capable, facilities must remember to also submit the revision to the state, such as on a diskette or hardcopy.

Slide 74
TRI-ME Tutorials
Duration: 00:01:03

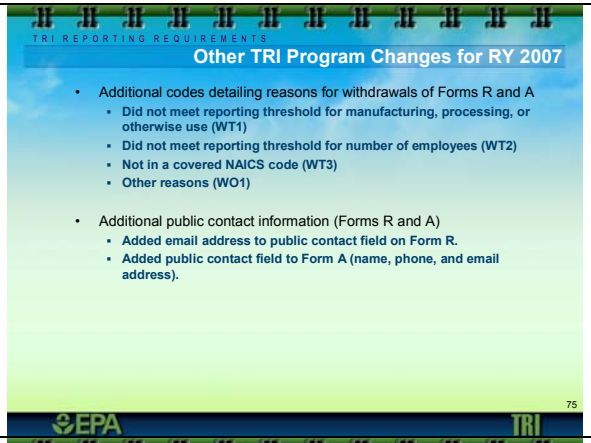


Notes:

There are other tools available to assist you with your TRI reporting and using the TRI Made Easy software. Beginning this year, EPA has developed on-line tutorials to assist users with the new TRI-ME web application. The tutorials cover all of the steps needed to access, submit, and certify TRI forms using TRI-ME web.

Beginning in reporting year 2005, EPA is providing TRI-ME tutorials. The tutorials walk you through the TRI reporting process using the TRI-ME desktop software. They are available from the EPA Website. In order to use them, you must have Internet access and a web browser and Macromedia Flash capability which you an also download from the Website shown here. There is audio along with the tutorials, so you would also need to have speakers or a headset.

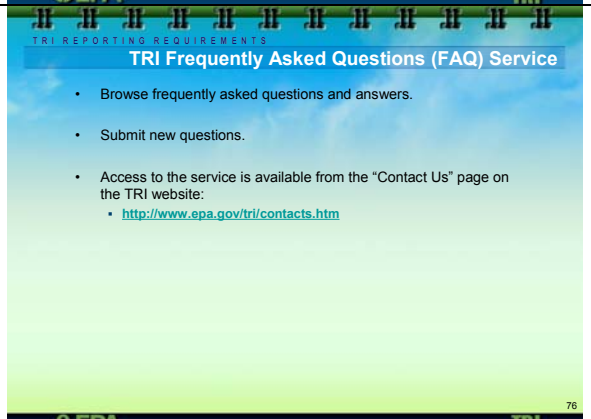
Slide 75
Other TRI Program Changes for RY 2007
Duration: 00:00:30



Notes:
For reporting year 2007, EPA has added codes detailing the reasons for withdrawals of Forms R and A. The new codes are show here.

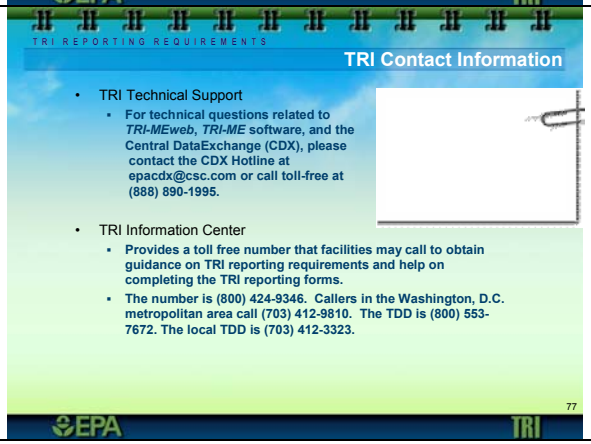
Finally, the TRI program has added additional public contact information to the forms. An email address for the public contact has been added to the Form R, and the public contact name, phone and email, has been added to the Form A.

Slide 76
TRI Frequently Asked Questions (FAQ) Service
Duration: 00:00:21

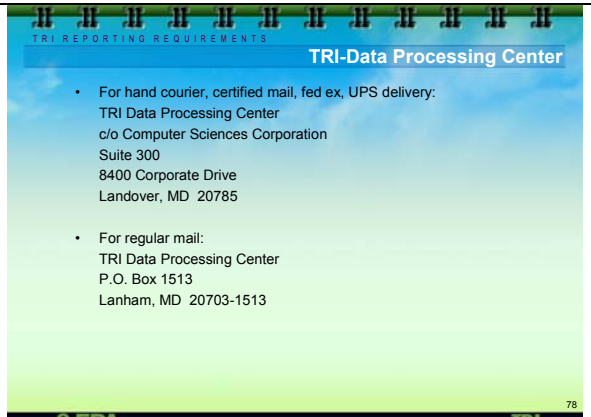


Notes:
Recently, the TRI Program has developed a Frequently Asked Questions Service. In addition to allowing facilities to browse past questions and answers, it also allows users to submit new questions and receive timely answers. This service new service can be accessed at the website shown here.

Slide 77
TRI Contact Information
Duration: 00:00:20



Notes:
If you want more information about TRI-ME web, TRI-ME desktop, and the central data exchange, please use the CDX hotline and email address shown here. For information on TRI in general, facilities can call the TRI information center at the numbers shown here.

Slide 78 **TRI-Data Processing Center** Duration: 00:00:20		**Notes:** If you need to send something by courier or certified mail, or by FedEx or UPS to the TRI Data Processing Center, use the address shown here. If you're sending something via regular mail to the TRI Data Processing Center, send it to the post office box shown here.
Slide 79 **End of Module** Duration: 00:00:05		**Notes:**